

APPENDIX D:
REVISIONS TO THE DGEIS
(REVISED DGEIS)

Elmwood Crossing

Draft Generic Environmental Impact Study

For the New York State Environmental Quality Review

Revisions to Draft Environmental Impact Statement **October, 2019**

187 & 219 Bryant Street, 125 Hodge Avenue, 451 & 489 Elmwood Avenue,
180, 184 & 188 West Utica Street
City of Buffalo, County of Erie

Prepared for:

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1.0 Project and Neighborhood Description, Project History, Purpose/Public Need and Benefit, the SEQR Process, Public Involvement, Required Approvals and Permits, and Project Schedule

1.1 Project and Neighborhood Description

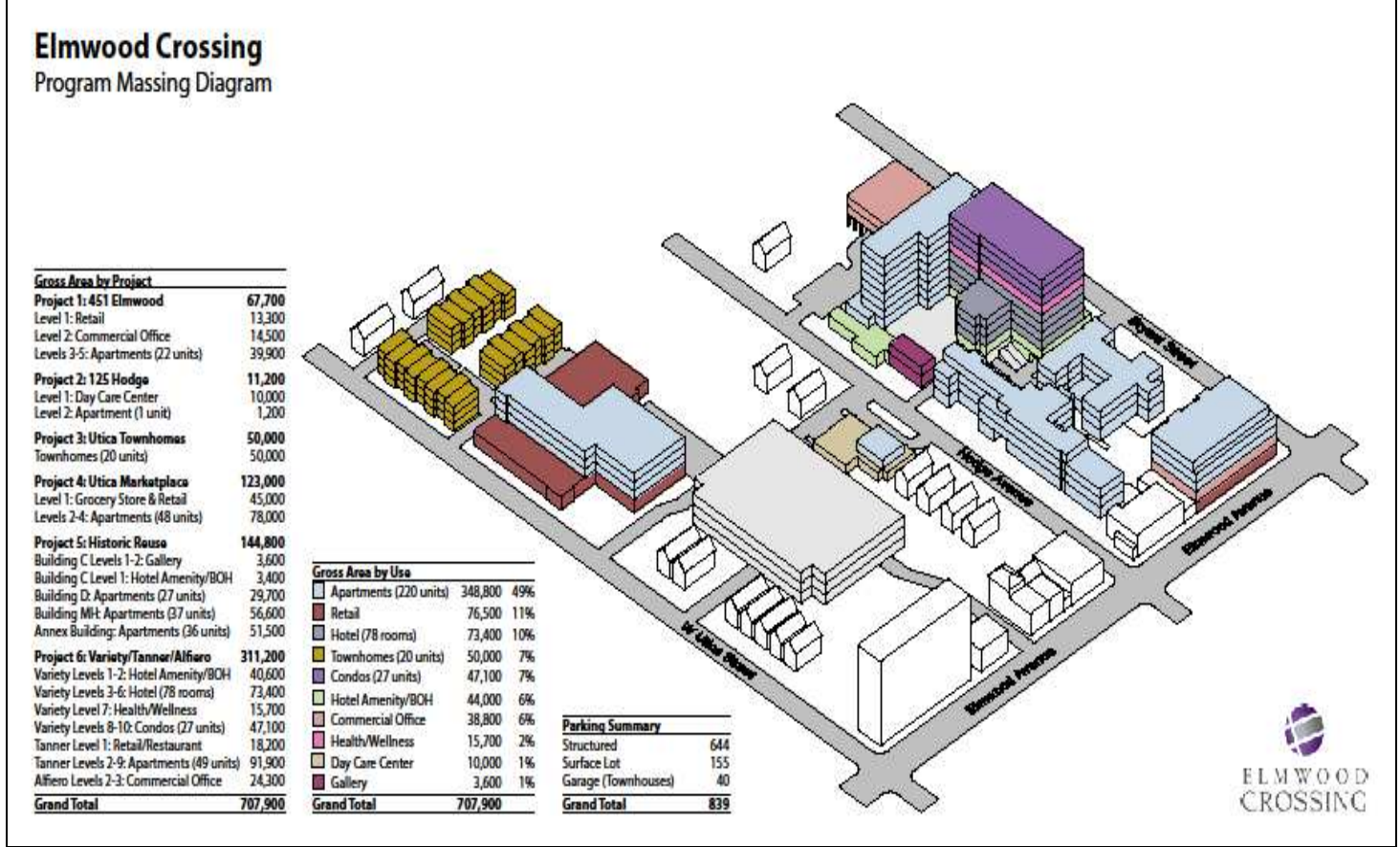
1.1.1 Project Description

The Elmwood Crossing mixed-use redevelopment project (the “Project”) will be located on various parcels on the east side of Elmwood Avenue, in the City of Buffalo, New York. The Elmwood Crossing site encompasses parcels between Utica Street and Bryant Street with the southern portion of the development located at the former site of the Women and Children’s Hospital of Buffalo (the “Site”). The Project consists of the redevelopment of parcels comprising the Project Area as a mixed-use project consisting of commercial, including retail, office, health/wellness, grocery store, and a daycare; hospitality, consisting of a hotel and related spaces; and residential uses, including apartments, townhomes and condominium units. The Project includes the rehabilitation and adaptive reuse of the former Woman and Children’s Hospital of Buffalo, and construction of new buildings. It is anticipated that the mixed-use redevelopment project will reuse more than 90% of the existing building spaces on the former Women and Children’s Hospital of Buffalo campus. Site and infrastructure improvements are also included in the Project. See Figures 1 and 2, below. These figures can also be found in a larger format in **Appendix A** (Master Plan) and **Appendix B** (Programming Diagram.)

Figure 1: Master Plan



Figure 2: Programming Diagram



More specifically described, the site's reuse will include:

- Residential units to include apartments, condominiums and townhomes. These residential products will serve both the rental and ownership market, with price points ranging from market-rate to luxury, to affordable.
- Space such as hotel, restaurant and health and wellness to attract and serve area visitors.
- Amenities to serve existing and future residents such as day care, market and small retail space.
- Integrated commercial office space.
- Gallery space.
- Public green space and interconnecting paths on the site.
- A demand for the Gallagher Ramp.

The following is a more descriptive summary of the various components of the Project. To aid in this review, reference Figure 2. Conceptual renderings of the various components are provided in **Appendix K**.

Component No. 1: 451 Elmwood Avenue at Bryant Street (+/- 72,693 sf total)

This previously approved five-story mixed-use building will include 1st floor retail, 2nd floor office and residential apartments on the 3rd – 5th floors. The design concept for the building

references the existing architectural language in the surrounding area. The building will be anchored to the corner using decorative cast stone wall panels and glass, which will provide a significant level of prominence to the corner. Atop the lower levels clad in decorative cast stone wall panels will be a red brick façade with recessed balcony spaces and fenestration to break up the façade and add visual interest. The top floor will include a step back, and introduce a material change to reduce impacts of the building height while adding visual interest along the primary elevations. While this building has already been approved, and a Negative Declaration under SEQR was issued, it is included in this discussion in order to evaluate the overall impacts of development on the area.

Component No. 2: 125 Hodge Avenue (+/- 10,123 sf total)

The existing two-story arts and crafts style structure at 125 Hodge Avenue will be expanded to the east with a single-story addition of approximately 5,440 sq. ft. This component of the mixed-use redevelopment project will be occupied by a daycare center. A portion of the second floor space in the existing structure will contain a residential apartment unit. The existing building will be re-clad in new, lighter color materials and receive new window openings along Hodge Avenue, all intended to soften the existing façade and make it more inviting. The proposed addition will reference the massing, roof lines, and exterior materials of the refinished existing structure.

Component No. 3: 188 West Utica (+/- 50,000 sf total)

The proposed plan includes the construction of up to 20 for-sale townhome units in three distinct linear blocks. Each of the townhome units will be three-stories in height, consistent with the scale of the surrounding neighborhood. The front elevation, with urban rowhouse design cues, will include an elevated main entry for guests, while the rear elevation will include resident access through a two-car garage with private patio space above, accessible off the main living level on the 2nd floor. The exterior of the townhomes will include large window openings, and a mix of high-quality materials such as stone and precast elements, along with cement board siding.

Component No. 4: 204 West Utica (+/- 119,241 sf total)

This new, multi-story, mixed-use infill building will be programmed for grocery store, and other retail use on the ground floor. The size will be approximately 36,000 sq. ft. with up to 60 upper floor residential units, over three floors. The design concept will provide a residential vocabulary on its upper floors to complement the surrounding neighborhood, while also catering to the commercial tenants' needs for vibrant main entryways, and extensive glazing on ground floor. This building will include a pedestrian connection to the Gallagher parking ramp at 489 Elmwood Avenue. This building will create something new for the neighborhood, while respecting what currently exists. Upper residential floors will step back, softening the impact on the street and neighboring properties, and communicate an approachable, pedestrian feel. While still in concept, the design intent is for a modern infill with a mixture of materials including glass, metal and fiber cement panels and wood elements to warm the building's appearance.

Component No. 5: Former MH and D Buildings on Hodge Avenue and Annex (A) Building on Bryant Street (+/- 146,840 sf total)

The former MH, D and Annex Buildings date back to the early 20th century, are eligible for Historic Tax Credits, and listed on the National Register of Historic Places. As such, there are limited exterior improvements that can be effectuated given the requirement to comply with the applicable guidelines of the Secretary of Interior's Standards for Historic Preservation. Through

the process of converting these former hospital structures into residential apartments including up to 120 units, exterior work will be limited to window repair and replacement as needed, masonry repair and repointing, new modern entrance features, exterior signage and lighting, and other temporary installations and landscaping.

Component No. 6: “Core Campus” – Former Variety and Tanner Towers, Alfiero and C Building Complex (+/- 311,249 sf total)

The former Variety Tower, Tanner and Alfiero Buildings will be redeveloped into a mixture of uses. The bulk of what was known as the C Building Complex will be demolished to create a new vehicular entryway and courtyard on the north side of the complex. The former Tanner Tower will include 1st and 2nd floor commercial space and up to sixty (60) residential apartment units on the 3rd – 9th floors. While limited in what can be done to modify the exterior of the Tanner Tower, as the building is Historic Tax Credit eligible, the exterior will be given a fresh look through signage, exterior lighting treatments, landscaping and other temporary features. Several architectural cues from the former Tanner Tower will be referenced in the redevelopment of the former Variety Tower exterior.

The former Variety Tower will include 1st and 2nd floor commercial space with hotel reception, lobby, amenity and back-of-house space. The 3rd – 6th floors will include hotel guestrooms, the 7th floor will include a health and wellness space, and the 8th – 10th floors will include upscale residential condominiums. Unlike the former Tanner Tower, the exterior treatment of the former Variety Tower will be fully transformed. The massing of the new exterior will identify the three distinct uses of the building. Considering the mass of the building, and taking advantage of the desire for residential terraces, recessed balconies have been introduced at the southwest corner and along the south and north facades. This strategy lightens the top of the building, while providing spectacular space and views to the residents. The hotel room floors are the main body of the structure, where a multi-dimensional cladding would be utilized and penetrated with horizontally oriented glazing and metal panel, referencing the mid-century ribbon windows on the east and west elevations of the former Tanner Tower. The base of the former Variety Tower is comprised of a two-story colonnade. These levels will engage the public as an entrance and hospitality area. This space will be transformed to create an elevated intermediary space between the public and the structure on the south elevation. The zone enhances the experience into the hotel as well as provided opportunity for an intermingling between activity at the pedestrian level and the occupants.

The former Alfiero building on the east end of the “core campus” will be redeveloped into commercial space. The building will be re-clad and modernized in concert with the former Variety Tower with an alternate color and material palette to visually separate it from the adjacent towers giving it a stand-alone identity and entranceway.

Component No. 7: 489 Elmwood Avenue – Gallagher Parking Ramp

Portions of the Gallagher parking ramp will remain accessible and useable to the public. The ramp will also be integrated into the Utica Street market. As such, increased wayfinding and entrance points will be added to make the parking ramp more accessible to both the public and designated users.

1.1.2. Neighborhood Description

The proposed Project lies within the Elmwood-Bryant neighborhood and is zoned as N-2C Mixed Use Center. The current gated surface parking lot lies within a diverse landscape of building styles, sizes and uses. See Existing Campus Photos at **Appendix E**.

The current neighborhood vernacular is comprised of traditionally styled structures, with a variety of exterior finishes, including wood, vinyl, brick, stone and masonry. The size and mass of neighboring structures are both at reduced, and greater, height and massing levels than the Project. See Existing Neighborhood Photos at **Appendix F**. The building uses are a mix of commercial, mixed-use and residential, with many multifamily residences, single family homes, storefronts, bars and restaurants within close proximity. A 12-story mixed-use building exists at 505 Elmwood, just North of 451 Elmwood. Two five-story residential buildings bookend Bryant Street at Delaware Avenue, which are across from the ten-story Campanile building. Immediately behind the Project are four-, nine- and ten-story buildings, which comprised portions of the Women and Children's Hospital of Buffalo campus. The new project will similarly consist of a mix of building types and sizes, and a mix of uses, including residential, retail, office and other uses. Notably, within the adjacent parcel is a helipad, in use through 2017.

1.2 Project History

During an approximate three-year period, commenced in 2011, Kaleida Health publicly unveiled the details of a formal plan to relocate the Women and Children's Hospital of Buffalo ("WCHOB") from its Bryant Street Campus, to the Buffalo Niagara Medical Campus. The decision by the health care system came after years of debate on the fate of the hospital at its Bryant Street location, which it had occupied since its founding in 1892. In preparation for the disposition of the property, Kaleida Health convened a community advisory committee in 2012, which would guide the process and provide input to the need to redevelop the property. This committee developed a formal statement of community values, with chief concerns, about the compatibility of new development with the existing neighborhood, and the timeliness of the build-out of any project plan.

The expressed community values were:

- **Engage the community** in an open conversation about the future of the property, listening to their suggestions and concerns, reaching out to those not usually represented, providing information about building conditions and market environment, and explaining decisions reached by Kaleida Health.
- **Keep an open mind** about what the project will be (use, design, form, density, etc.) and how it will proceed (by restoration, adaptive reuse, demolition, or a combination thereof) and structure an open process to give free rein to the creativity of potential developers, even as their proposals are evaluated according to expressed community values.
- **Move forward with dispatch**, minimizing the time between closure of the hospital and opening of new uses, and allowing parts of the development to advance – when possible – even before the hospital closes.
- **Provide a sustainable reuse** for the property – successful, stable, market-based and tax-producing in the long-term – minimizing the possibility that all or part of the new project might become vacant or be redeveloped again in the near term.

- **Seek financial support** to overcome potential barriers to redevelopment inherent in the existing buildings such as asbestos or for the demolition of all or part of the complex to ensure the timely redevelopment and reuse of the property.
- **Find creative solutions to parking** automobiles, maximizing use of the existing city ramp, minimizing surface parking, maintaining customer access for businesses, and preserving convenience for residents, even as we move toward a more multi-modal transportation future.
- **Select a project that fits** the specific character of the immediate neighborhood and the larger Elmwood Village, the mix of housing types, the diversity of the business district, the heterogeneous character of use, design and form, and the overall quality of urban design, landscape design, and architecture.
- **Preserve and enhance the neighborhood**, the strength and vibrancy of commercial uses and the quality of residential neighborhoods, keeping the best characteristics of the strongest blocks, helping the weaker blocks achieve improvements, and learning from best practices to create an environment that is welcoming and beautiful.
- **Consider new green space** as a strategic addition to the mix of uses and forms now present in the neighborhood, providing places for recreation, public gathering and events and making new connections within the neighborhood.

Kaleida Health, under the guidance of management and stakeholders, issued a formal Request for Proposals on September 8, 2015. Both Ellicott Development Company and Sinatra & Company Real Estate were respondents to the RFP, among three other firms. Both Ellicott and Sinatra proposed a mixed-use redevelopment of the site. Neither Sinatra & Company Real Estate, nor Ellicott Development Company were selected by Kaleida as the winning proposal. However, in July, 2017, progress had stalled with the designated developer, and Kaleida Health approached Sinatra & Company Real Estate and Ellicott Development Company, and requested they take on the role as developer for the WCHOB property, which would be vacated by the hospital in November, 2017. Sinatra & Company Real Estate and Ellicott Development Company agreed to do so, and commenced working with community members to develop a joint plan for the reuse.

The two companies formed a joint entity, Elmwood Crossing LLC, the “Applicant” or “Project Sponsor” for this development. The Project Sponsor is preparing for the transformation of the former Women and Children’s Hospital of Buffalo. The sprawling campus, expanding over almost 8 acres, with over 600,000 square feet, across 8 distinct structures, will be rewoven into the existing neighborhood fabric. The development team conceived Elmwood Crossing, a proposed mixed-use development of the Women and Children’s Hospital of Buffalo.

1.3 Purpose/Public Need and Benefit

In 2017, Elmwood Crossing LLC announced its purpose as; Integrate into the existing neighborhood fabric a premier, mixed use urban center that will provide innovative solutions for demand into the urban campus redevelopment. Among the desired uses are residential housing of assorted types, including townhomes, condominiums, and apartments that will be marketed for both purchase and rent. In addition to residential use, the team seeks to appropriately augment the site with neighborhood amenities. Anticipated amenities include a full-service grocer, boutique retail, fitness center, restaurant, services, such as dry cleaning and automated banking. An additional use being examined includes a boutique hotel.

The project has evolved under a new development team, and the following information was added about the community values and their development: *“After a full consideration of proposed reuses, and the community response to those ideas, the project fundamentals were further refined to be:*

- *A phased approach to the site’s redevelopment.*
- *An integrated reuse that is primarily residential in nature, including rental and owned residences of varying types, including apartments, townhomes and condominiums.*
- *Design standards that are reflective of the existing neighborhood fabric, along with an attention to the City of Buffalo’s Green Code as feasible.*
- *Commitment to appropriate retention of viable structures.*

As the planning continued, elements such as educational use were eliminated, while attention increased on Interconnectivity amongst the site and the existing neighborhood.

The overall project plan has remained in line with earliest conceptions, where the project is primarily residential in nature, with amenities that will benefit the community at-large.

More specifically described, the site’s reuse will include:

- Residential units to include apartments, condominiums and townhomes. These residential products will serve both the rental and ownership market, with price points ranging from market-rate to luxury, to affordable.
- Space such as hotel, restaurant and health and wellness to attract and serve area visitors.
- Amenities to serve existing and future residents such as day care, market and small retail space.
- Integrated commercial office space.
- Gallery space.
- Public green space and interconnective paths on the site.
- A demand for the Gallagher Ramp.

It is important to understand that this above stated purpose is based on the work completed up to 2017, which included the Elmwood Village Association’s community engagement process, “Elmwood Conversations”, in 2014.

The Vision document outlined key goals and strategies from “Elmwood Conversations, the Next Ten Years: A Vision for the Elmwood Village”:

TRANSPORTATION: The Vision charges that “people of all ages and abilities can travel to and within the Elmwood Village safely and reliably, and affordably with or without a car.” 451 Elmwood provide office and apartments where occupants will have ease of access to the NFTA transit stop on the block, and will include a ride share waiting area, particularly for last-mile rideshare users from the Summer/Best NFTA Rail stop station. It provides a plan for parking, yet has balanced community desire for reduced surface parking lots by reuse of existing parking resources at the John C Gallagher ramp.

BUSINESSES: Included within the Vision is an emphasis to “Support existing businesses and the creation of diverse new ones.” The proposed Project increases

population density, which will rely on existing businesses for goods and services, as well as create new, accessible commercial spaces to promote the flourishing of new business activity and employment within the area. The Project calls for the addition of both ground level retail options, as well as professional office space, allowing for diversity in commercial activity and employment opportunities.

PUBLIC SPACES: The Vision expresses a desire to “Ensure the availability of appropriate greenspaces and safe places to gather and play”. 451 Elmwood provides increased access to a proposed neighboring pocket park, greenways and art installations than previously existed as a gated, guarded private parking lot,

ARTS, CULTURE AND EDUCATION: The proposed restaurant space creates an indirect opportunity to this category, encouraging visitors to the neighborhood to have longer visits within the area by way of places to rest, relax and recharge while enjoying the vast cultural resources in this area. (Eliminated Educational component)

CONNECTIONS: The configuration of 451 Elmwood takes visitors, residents and occupants off site throughout the neighborhood, drawing occupants along pathways to parking, shopping and services available throughout Elmwood Crossing, and the broader Village. Correspondingly, existing residents can access the site through Elmwood Crossing.

COMMUNITY: The relocation of the Women and Children’s Hospital of Buffalo has an impact on the community and the Vision prescribes “community engagement and strengthening of relationships.” To meet this goal, the development team has reached out voluntarily to engage business leaders, neighbors, community members and worked with a dedicated Project Advisory Committee.

REVITALIZATION: The Vision expresses a need to “address declining neighborhoods and chronically vacant buildings”. 451 Elmwood provides investment, new products and additional residents to a commercial strip that has faced these pressures.

Also, within this Vision were explicit recommendations to separate the campus into multiple redevelopment parcels for Request for Proposals, including a specified separate redevelopment opportunity for the parking lot on the corner of Elmwood and Bryant. See also Public Meeting Minutes at **Appendix X**.

1.4 State Environmental Quality Review Process

This section of the Draft Generic Environmental Impact Statement (“DGEIS”) describes the process coordinated environmental review of the proposed mixed-use redevelopment project pursuant to the State Environmental Quality Review Act (“SEQRA”). The review process for the proposed mixed-use redevelopment project involves many steps including the following:

- A coordinated environmental review of the proposed mixed use project pursuant to SEQRA including the review of this DGEIS, the preparation of a Final Generic Environmental Impact Statement (“FGEIS”) and the issuance of a Finding Statement by the City of Buffalo Planning Board, in its capacity as the designated lead agency. A detailed discussion of the steps involved in the coordinated environmental review

of the Project pursuant to SEQRA that will include opportunities for public input is provided below in Section 1.4.3.

- Approval by the City of Buffalo Common Council of a proposed Planned Unit Development (“PUD”) to implement the proposed mixed-use redevelopment project in a manner consistent with the Conceptual Plan.
- Site Plan approvals by the City of Buffalo Planning Board and other permits and approvals from involved agencies necessary in connection with the review of Site Plan applications for the various components of the overall Project.
- Subdivision approval by the City of Buffalo Planning Board for the creation of new parcels consisting of the combination of a portion of 187 and 219 Bryant Street; the combination of 180, 184 and 188 Bryant Street; and the combination of a portion of 219 Bryant Street and 451 Elmwood Avenue for the previously approved five-story mixed use building.

In accordance with the procedural requirements pertaining to a project involving the review of an Environmental Impact Statement (“EIS”), there will be numerous opportunities for public review and comment as described in greater detail below in Section 1.5.

1.4.1 Purpose of the DGEIS:

This DGEIS has been prepared pursuant to the requirements of the State Environmental Quality Review Act and its implementing regulations as promulgated by SEQRA. The purpose of this DGEIS is to assist the Planning Board, the designated lead agency, as well as involved and interested agencies and the public, in completing a thorough evaluation of the identified potential adverse impacts that will result from the proposed mixed-use neighborhood. Additionally, this DGEIS provides information on a broad range of topics as required by the SEQRA Regulations, including alternatives to the proposed mixed-use project and proposed mitigation measures.

1.4.2 The Legislative Intent of SEQRA:

The basic purpose of SEQRA is to incorporate the consideration of environmental factors into the existing planning, review and decision-making of government agencies at the earliest possible time. SEQRA requires agencies to balance social, economic and environmental factors in making decisions on applications for discretionary land use approvals. It is important to mention that the SEQRA Regulations expressly state that it is not the intention of SEQRA that environmental factors be the sole consideration in decision-making.

The environmental review of the proposed action pursuant to SEQRA provides a process for the evaluation of potential adverse environmental impacts in the early planning stages of actions that are directly undertaken, funded, or approved by local, regional, or state agencies. By incorporating a systematic interdisciplinary approach to environmental review in the early stages of the review of a proposed project, impacts can be identified and evaluated, and mitigation measures can be imposed by a lead agency to avoid or minimize significant adverse environmental impacts to the maximum extent practicable.

1.4.3 Steps in the Environmental Review of the Proposed Mixed-Use Redevelopment Project (“Action”) Pursuant to SEQRA:

An overview of the important steps in the required coordinated environmental review of the proposed mixed-use neighborhood has been provided within this subsection of the DGEIS. The goal in providing this overview is to provide the reader with an understanding of the manner by which SEQRA requires identified environmental impacts to be evaluated prior to a decision is made by the lead agency or an involved agency with respect to required discretionary land use approvals and/or permits for a proposed project.

The Project constitutes an "action" that is subject to SEQRA. The SEQRA regulations define "actions" broadly as including:

Projects or physical activities, such as construction or other activities that may affect the environment by changing the use, appearance or condition of any natural resource or structure, that: (i) are directly undertaken by an agency; or (ii) involve funding by an agency; or (iii) require one or more new or modified approvals from an agency or agencies.

The overview of the important steps in the coordinated environmental review of the Project pursuant to SEQRA provided below demonstrates the degree to which the Planning Board, in its capacity as the designated lead agency, as well as involved and interested agencies, and the public will have numerous opportunities to participate in the environmental review of the Project pursuant to SEQRA.

Step 1: *Submission of Major Subdivision Application:*

On April 30, 2018, the Project Sponsor submitted a Major Subdivision Application and supporting documentation in connection with the proposed creation of new parcels consisting of the combination of a portion of 187 and 219 Bryant Street; the combination of 180, 184 and 188 Bryant Street; and the combination of a portion of 219 Bryant Street and 451 Elmwood Avenue for the previously approved five-story mixed use building. See Major Subdivision Application at **Appendix G**.

Step 2: *Classification of the Action:*

Projects ("actions") that are subject to an environmental review pursuant to SEQRA are either Type I or Unlisted actions. The Planning Board properly classified the Project as a Type I action on September 8, 2014 since it involves activities that cross more than one of the thresholds for a Type I action set forth at 6 NYCRR Part 617.4(b). The project falls within the Elmwood Historic District (east), which is listed on the National and State Registers of Historic Places. Therefore, in accordance with 6 NYCRR Part 617.4(b)(9), it is a Type 1 Action.

Step 3: *Establishment of a Lead Agency:*

The establishment of a lead agency is an important step in the environmental review process pursuant SEQRA. The lead agency has the principal responsibility of ensuring compliance with both SEQRA's procedural and substantive requirements. During its meeting on May 7, 2018, the Planning Board adopted a resolution for the purpose of expressing its intent to become the lead agency for the coordinated environmental review of the Project.

On May 8, 2018, a lead agency solicitation letter and copy of the Major Subdivision Application and supporting documentation were distributed by the City's Planning Department to involved and interested agencies for the purpose of expressing the Planning Board's interest in being designated the lead agency for the purpose of the coordinated environmental review of the Project pursuant to SEQRA. See Notice of Intent at **Appendix H**.

The SEQRA regulations require that an agency that receives an application for a project that is a Type I action requiring one of more discretionary approvals or permits provide involved agencies with 30 days to comment on a lead agency solicitation request. The Planning Board provided involved and interested agencies with the required 30 days to comment on its intent to become the designated lead agency. None of the involved or interested agencies objected to the Planning Board's request to become the designated lead agency.

On June 18, 2018, the Planning Board was established as the designated lead agency and as such became the agency with primary responsibility for completing the coordinated environmental review of the Project pursuant to SEQRA.

Step 4: Determination of Significance - Issuance of a Positive Declaration:

On June 18, 2018, the Planning Board issued a positive declaration based on its determination that the Project may result in potentially significant adverse environmental impacts. See Planning Board Positive Declaration at **Appendix I**. Within the positive declaration issued by the Planning Board, it identified three categories of potentially significant adverse environmental impacts as follows:

- *Surface Water: Implementation of the Action has the potential to result in a significant impact on the existing sewer capacity in the project area.*
- *Historic Resources: Implementation of the Action has the potential to result in a significant impact on historic resources on site and in the project area.*
- *Transportation: Implementation of the Action has the potential to result in a significant impact on the existing transportation network in the project area.*

Within the positive declaration, the Planning Board determined that a DGEIS was required instead of a site specific Draft Environmental Impact Statement ("DEIS") since: the precise layout of the proposed mixed-use redevelopment has not yet been determined; the proposed Action will require numerous future discretionary approvals and permits including but not limited to PUD and Site Plan approvals for the various components of the overall proposed mixed-use project; and, it is anticipated that build-out of the overall proposed mixed-use redevelopment project will occur over a multi-year time period. The preparation of a DGEIS allows the Planning Board, in its capacity as the designated lead agency, the ability to establish thresholds for the consideration of future requests for required discretionary approvals that will be required for the overall proposed mixed-use redevelopment Project.

Step 5: Preparation and Submission of the Draft Generic Environmental Impact Statement ("DGEIS"):

The Project Sponsor prepared this DGEIS in accordance with the positive declaration issued by the Planning Board on June 18, 2018 and the Final Scope adopted January 28, 2019. See Final Scope at **Appendix J**. The Planning Board, acting in its capacity as the designated lead agency, has the responsibility for reviewing this DGEIS for purpose of determining if it is adequate for the purpose of commencing the required public review period. The Planning Board is required to determine if this DGEIS is adequate for public review within 45 days of its submission. If the Planning Board determines this DGEIS is not adequate for public review, a letter must be sent to the Project Sponsor indicating the deficiencies that need to be addressed in connection with the submission of an updated version of this DGEIS.

Step 6: Acceptance of DGEIS by the Lead Agency as Adequate for Public Review and Public Review:

Once the Planning Board has completed its review of this DGEIS and determined it to be adequate for public review, the Planning Board will establish a public review period as required by SEQRA. Although not required by SEQRA, the Project Sponsor anticipates that the Planning Board will hold a public hearing during the public comment period.

Step 7: Preparation of the Final Generic Environmental Impact Statement ("FGEIS"):

Once the public comment period on the DGEIS has ended, the next step in the environmental review process pursuant to SEQRA consists of the preparation of a Final Generic Environmental Impact Statement ("FGEIS"). The SEQRA Regulations require that a FGEIS include copies or a summary of the substantive comments received by the lead agency during the public comment period, the source of the substantive comments along with the lead agency's responses to all substantive comments.

Step 8: Issuance of a Findings Statement by the Lead Agency:

The environmental review of a project pursuant to SEQRA involving the issuance of a positive declaration by the lead agency concludes with the issuance of a Findings Statement. Prior to the Planning Board issuing a Findings Statement for the proposed mixed-use project, it will be required to afford involved agencies and the public with at least ten (10) calendar days in which to consider the FGEIS.

In order for the lead agency to issue a decision on a requested discretionary land use approval (e.g. the pending request for Major Subdivision Approval) for a proposed project that has been the subject of an EIS, the lead agency must first prepare and issue a Findings Statement. The Findings Statement to be issued by the lead agency must:

- (1) Consider the relevant environmental impacts, facts and conclusions disclosed in the final GEIS;
- (2) Weigh and balance relevant environmental impacts with social, economic and other consideration;
- (3) Provide a rationale for the agency's decision;
- (4) Certify that the requirements of SEQRA have been met; and
- (5) Certify that consistent with social, economic and other essential consideration from among the reasonable alternatives available, the action is the one that avoids or minimizes adverse environmental impacts to the maximum extent practicable, and that adverse environmental impacts will be avoided by incorporating as conditions to the decision those mitigative measures that were identified as practicable.

1.4.4 Segmentation

In Part 617.2(ag), segmentation is defined as the division of the environmental review of an action so that various activities or stages are addressed as though they were independent, unrelated activities needing individual determinations of significance. Except in special circumstances, considering only a part, or segment, of an overall action is contrary to the intent of SEQR.

There are two types of situations where segmentation typically occurs. One is where a project sponsor attempts to avoid a thorough environmental review (often an EIS) of a whole action by splitting a project into two or more smaller projects. The second is where activities that may be occurring at different times or places are excluded from the scope of the environmental review. By excluding subsequent phases or associated project components from the environmental review, the project may appear more acceptable to the reviewing agencies and the public. The City of Buffalo Planning Board, acting as Lead Agency, decided to conduct a segmented review of the 451 Elmwood project. The Applicant and other involved agencies may supply information to assist the Planning Board, but ultimately it is the responsibility of the lead agency to make an independent assessment of the actual extent scope of the project and to document the decision to undertake a segmented review. Ultimately the Planning Board decided to conduct a segmented review providing the entire Elmwood Crossing development would be reviewed during this DGEIS process.

The reasons supporting the segmented review included the following:

- The 451 Elmwood project includes a small portion of the approximately 4.8 acre former Children's Hospital site at 219 Bryant Street that is zoned N2-C. The small portion of 219 Bryant Street to be redeveloped as a mixed use building currently consists of surface parking spaces and does not include any of the former Children's Hospital buildings. This project was reviewed by the City Planning Board and SEQR was completed through the use of the Full EAF, including parts 1, 2 and an expanded part 3, and a Negative Declaration was issued.
- The Elmwood Crossing LLC intended to undertake the redevelopment of the former of Children's Hospital buildings in the future and acknowledges that the redevelopment project will require the preparation and submission of an Environmental Impact Statement.
- The preparation of an Environmental Impact Statement for the redevelopment of the former Children's Hospital site ensures that the environmental review of the proposed mixed use building will be "no less protective of the environment" since it ensures Elmwood Crossing LLC is not attempting to avoid the preparation and submission of an Environmental Impact Statement by splitting an overall project into smaller components.
- The 451 Elmwood project coordinates with the redevelopment of the former Children's Hospital site, but the Children's Hospital redevelopment is not "functionally dependent" on the prior project, meaning it does not rely on the success of the building at 451 Elmwood to be viable.
- Approval of the proposed mixed use building does not in any way commit the City to approving the overall redevelopment of the former Children's Hospital site.
- Elmwood Crossing LLC acquired the former Children's Hospital site in November of 2017 and is in the process of conducting the numerous detailed investigations necessary to formulate a redevelopment plan for the vacant former Children's Hospital buildings and properties at 187 and 219 Bryant Street, 125 Hodge and 188 W. Utica Street as well the parcel at 204 West Utica Street (which it is anticipated will be redeveloped pursuant to a long term land lease).
- Elmwood Crossing LLC anticipates that once the necessary investigations of the vacant former hospital including the numerous required reports and studies have been completed, that it will proceed with seeking the required approvals for the redevelopment

of the overall former Children's Hospital site including but not limited to an application for Planned Unit Development Approval, which will require review and approval by the Common Council.

- The individual components of the overall redevelopment project will require Site Plan Approval.

For these reasons, the Planning Board allowed the project at 451 Elmwood to be approved, subject to its incorporation into the analysis contained in this DGEIS. Because that has been done, the original segmented review was appropriate.

1.4.5 Reasons in Support of the Preparation of a Draft Generic Environmental Impact Statement ("DGEIS):

The SEQRA Regulations expressly authorize the submission of a DGEIS for larger projects to be constructed over a multiyear period in which the precise layout of a project has not been determined. More specifically, 6 NYCRR Part 617.10 (titled "Generic environmental impacts statements") states as follows:

§617.10 Generic environmental impact statements

(a) Generic EISs may be broader, and more general than site or project specific EISs and should discuss the logic and rationale for the choices advanced. They may also include an assessment of specific impacts if such details are available. They may be based on conceptual information in some cases. They may identify the important elements of the natural resource base as well as the existing and projected cultural features, patterns and character. They may discuss in general terms the constraints and consequences of any narrowing of future options. They may present and analyze in general terms a few hypothetical scenarios that could and are likely to occur. A generic EIS may be used to assess the environmental impacts of:

- (1) a number of separate actions in a given geographic area which, if considered singly, may have minor impacts, but if considered together may have significant impacts; or*
- (2) a sequence of actions, contemplated by a single agency or individual; or*
- (3) separate actions having generic or common impacts; or*
- (4) an entire program or plan having wide application or restricting the range of future alternative policies or projects, including new or significant changes to existing land use plans, development plans, zoning regulations or agency comprehensive resource management plans.*

The Conceptual Plan prepared by the Project Sponsor illustrates the organization of an integrated mixture of land uses and the magnitude of the proposed mixed-use redevelopment of the Site. See **Appendix A**. It is anticipated that the Project Sponsor will implement the redevelopment of the Site in a manner generally consistent with the Conceptual Plan over a multiyear period. The final form of the proposed mixed-use redevelopment project and the precise sequencing and time period for development of the Site in a manner consistent with the Conceptual Plan will depend on market demand and cannot be precisely determined at this time.

The SEQRA regulations state that a DGEIS is appropriate for a series or sequence of separate actions and/or projects that have wide application or restrict the range of future alternative policies. Accordingly, a DGEIS differs from a DEIS by being more conceptual, with a DGEIS assessing a broad scope of a group of actions or a combination of effects from a single action.

A DGEIS is appropriate for the environmental review of the Project since the Site is relatively large; the Project Sponsor will be seeking Planned Unit Development approval to facilitate the mixed-use redevelopment project; the Project involves the review of a Conceptual Plan; and construction of the Project will be phased over an anticipated period of 3 years.

While the Project Sponsor's objective is to develop the Site in a manner consistent with the Conceptual Plan, the preparation and review of a DGEIS is also appropriate because the precise layout, sequencing and timing of the construction of the mixed-use components cannot be determined at this time because it will be dependent on many factors outside the control of the Project Sponsor including market conditions. This DGEIS affords the Planning Board, in its capacity as the designated lead agency, as well involved and interested agencies and public with the opportunity to evaluate a broad range of anticipated impacts, and it also ensures that related actions will not be segmented in order to avoid the required analysis of the overall proposed mixed-use redevelopment of the Site. One of the key benefits resulting from the use of a DGEIS as opposed to a DEIS is that because the Site will need to be redeveloped in accordance with site plan applications to be submitted for review and approval in the future, the use of a DGEIS allows a lead agency to establish thresholds for future environmental review of potential adverse environmental impacts that may arise over the build-out of the mixed use project. A lead agency does not have the ability to establish thresholds for future environmental review if a standard DEIS is utilized.

The Project Sponsor expects that the Planning Board, in its role as the lead agency, will establish thresholds for future environmental review of related actions within the Findings Statement that will be issued at the conclusion of the coordinated environmental review of the Project pursuant to SEQRA. If the Planning Board determines in the future that any adverse environmental impacts not addressed within this DGEIS are potentially significant, then the Project Sponsor will be required to prepare a Supplemental Environmental Impact Statement ("SEIS"). If the Planning Board determines that impacts not addressed within this DGEIS are not potentially significant, then the Planning Board will issue a negative declaration pursuant to SEQRA. A discussion of the proposed thresholds for future related actions is provided in Section 2 of this DGEIS.

1.5 Public Involvement

Elmwood Crossing LLC (the "Project Sponsor") has made a concerted effort to solicit input from various stakeholders in connection with formulating plans for the mixed-use redevelopment project. See Public Meeting Minutes generally at **Appendix X**. A Project Advisory Committee ("PAC") was created by Kaleida Health as part its commitment to a transparent process for the reuse of the Site. As a first step, Kaleida Health held preliminary discussions in the fall of 2012 and the beginning of 2013. Community leaders with an interest in the future development of the Bryant, Hodge, and Utica Street properties were invited to discuss their vision for the reuse process and how to engage the public in the decisions ahead.

With additional community input from an open forum held in January 2013, Kaleida Health named a PAC in April 2013. The PAC is a cross section of community members chosen to reflect a diversity of viewpoints from immediate neighbors, local businesses, leaders of community-based organizations, offices of elected officials, professionals with relevant expertise, people from major community institutions and more.

In their initial meetings during summer 2013, the PAC developed a community values statement and initiated work around market research and developing a Request For Proposal ("RFP").

1.5.1 Informational Meetings held by the Project Sponsor:

The Project Sponsor has held numerous informational meetings with stakeholders early in the review of the proposed Project in furtherance of its goal of participating in an open and deliberative review process. See Table 1.3.1 below. The focus of the informational meetings has been on discussing plans for the proposed mixed-use redevelopment project and obtaining input and feedback from the numerous stakeholders including nearby property owners. The Project Sponsor has also established a project web site (www.elmwoodcrossing.com), as well as social media channels, to provide an overview of the mixed-use redevelopment project, and current information regarding the review process.

TABLE 1.5.1
ELMWOOD CROSSING: COMMUNITY ENGAGEMENT OPPORTUNITIES

DATE	MEETING	PLACE
August 20, 2017	Project Advisory Committee	Women and Children's Hospital of Buffalo
September 20, 2017	Project Advisory Committee	Women and Children's Hospital of Buffalo
October 25, 2017	Project Advisory Committee	Women and Children's Hospital of Buffalo
October 30, 2017	Elmwood Business Leader	Thin Man, Buffalo, NY
November 8, 2017	Block Club Meeting	Women and Children's Hospital of Buffalo
December 14, 2017	Project Advisory Committee	Market Arcade, Buffalo, NY
January 4, 2018	Hodge Avenue Block Club Meeting	Private Residence, 61 Hodge Avenue, Buffalo, NY
January 31, 2018	Public Meeting	Elmwood Village Association, Elmwood Avenue, Buffalo
February 1, 2018	Digital Information Site Launched	ElmwoodCrossing.com, Facebook Site
March 1, 2018	Elmwood Village Association Member Event	Private Residence, 190 Bryant Street, Buffalo, NY
March 21, 2018	Project Advisory Committee	Market Arcade, Buffalo, NY
April 9, 2018	Public Hearing	City Hall, Buffalo NY
May 3, 2018	Bryant-Oakland Summer Annual Meeting	Red Cross Building, Delaware Avenue, Buffalo
June 27, 2018	Project Advisory Committee	Market Arcade, Buffalo, NY
September 19, 2018	Project Advisory Committee	Market Arcade, Buffalo, NY
October 18, 2018	Community Information Opportunity	Kleinhan's Music Hall, Buffalo, NY
March 5, 2019	Project Advisory Committee	Market Arcade, Buffalo, NY

1.6 Description of Required Approvals and Permits

The complete list of anticipated approvals and permits required for the Project are provided in Table 1.6 below:

TABLE 1.6

REQUIRED APPROVALS AND PERMITS FOR THE ELMWOOD CROSSING PROJECT

Agency	Description of Permit or Approval Required
City of Buffalo Common Council	Planned Unit Development Approval (Acquisition of the parking garage located at 489 Elmwood Avenue)
City of Buffalo Planning Board	Major Subdivision Approval (Site Plan Approvals for various components of the overall mixed-use redevelopment project)
City of Buffalo Sewer Authority	Downstream Sanitary Sewer Capacity (Analysis and storm sewer)
City of Buffalo Water Authority	RPZ and Water

Agency	Description of Permit or Approval Required
City of Buffalo Building Department	Demolition Permits (Building permits)
City of Buffalo Preservation Board	
Erie County Industrial Development Agency	PILOT, Sales Tax Exemption on Construction Materials and Mortgage Recording Tax Exemption
NYS Department of Environmental Conservation	Brownfield Cleanup Program Eligibility Determinations, Brownfield Cleanup Certificates of Completion
NYS Office of Parks, Recreation, and Historic Preservation	Historic Tax Credits (Cultural resources determination of no adverse effect)
National Park Services	Historic Tax Credits

1.7 Project Schedule

After the receipt of the required approvals and permits for the proposed mixed-use redevelopment project from the City's municipal boards and other involved agencies (refer to Table 1-1 above), the Project Sponsor expects to initiate construction of the project in the spring of 2020 and the build-out period for the mixed-use redevelopment project is anticipated to be approximately three years. Components of the mixed-use project will be scheduled, constructed and completed based on market demand and tenant requirements. The anticipated schedule may be adjusted in response to fluctuating market conditions.

2.0 Potential Environmental Impacts

2.1 Land Use and Zoning

2.1.1 Potential Impacts

The project may include components that could be perceived as being in contrast to surrounding land use patterns. The project may also not be in accordance with the City's Zoning (UDO), Comprehensive Plan and recent community planning.

2.1.2 Existing Conditions and Analysis

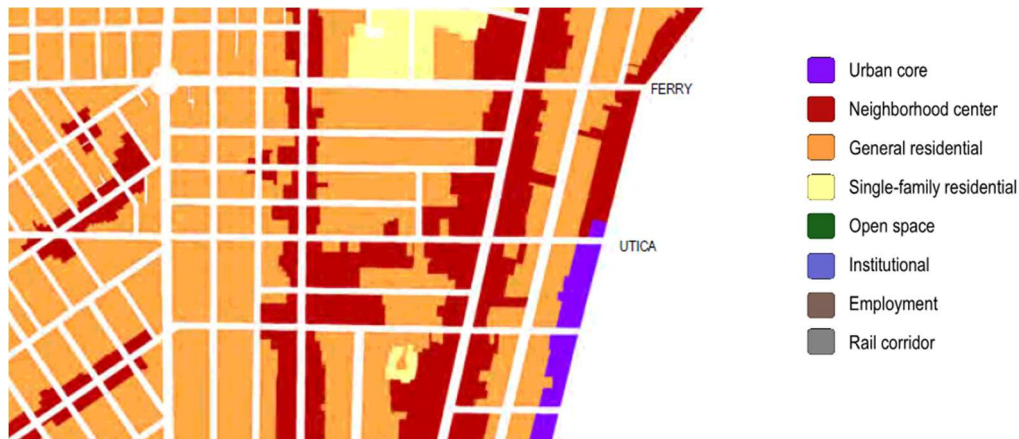
Land Use

The buildings on the former Children's Hospital campus have been vacant since 2017. The site has housed a hospital for approximately 120 years, although the institutional buildings on the site date from the 1920's through the late 20th century. Prior to closing, the facility operated 24 hours a day and was served by ambulances, delivery vehicles, cars, helipad, and other vehicles. The Gallagher Ramp has remained largely underutilized since the hospital closed in 2017. With limited exception, most of the structures on the campus have been vacant.

Surrounding land uses have not varied since the hospital closed. The northern boundary of the site (West Utica Street) is largely residential in nature, transitioning to non-residential as you near Delaware Avenue. A former commercial building at 169 West Utica Street will be demolished for an approved redevelopment into residential condos. The existing vacant building at 204 West Utica was most recently utilized as a drug store and previously as a supermarket. Churches and a nursing facility are on West Utica near the intersection with Delaware Avenue.

The neighborhood along Hodge Street east of the site is also residential in character development until you approach Delaware Avenue, where there are larger uses and institutional uses (larger apartment complexes, offices, non-profits, etc). South of the property along Bryant Street is another area of primarily residential development. The western border of the Site is Elmwood Avenue which is a largely commercial district with a mix of residential, retail, and commercial uses. For reference to existing land use patterns, see the 2016 Buffalo Land Use Plan. <https://www.buffalony.gov/DocumentCenter/View/3276/Land-Use-Plan>

The City's Land Use Plan depicts a new proposed new land use policy for this area (p. 65) which identifies the former Children's Hospital site as a "Neighborhood Center." Consistent with the local character along Elmwood Avenue, a neighborhood center would consist of a mix of residential, office, retail and other uses.



Proposed Land Use Plan of area NOTE Include full map in appendix

Comprehensive Plan

The proposed development needs to be consistent with the City of Buffalo Comprehensive Plan. <http://regional-institute.buffalo.edu/wp-content/uploads/sites/3/2014/06/Queen-City-in-the-21st-Century-Buffalos-Comprehensive-Plan1.pdf> The Queen City in the 21st Century (February 2006) is a twenty-year comprehensive plan created by the Office of Strategic Planning and adopted by the Common Council in 2006. The aim of the Comprehensive Plan is to use Smart Growth strategies to reinvigorate the City. The Plan's key principles are sustainability and working from the concept of "fix the basics, build on assets." The multifaceted plan recommends the implementation of many specific tools, but broadly, the Comprehensive Plan focuses on the economy, the community, the environment, infrastructure, financial capacity and control, and planning and zoning, across the following themes:

1. Delivering quality public services.
2. Maintaining public infrastructure.
3. Transforming Buffalo's economy.
4. Reconstructing the schools.
5. Rebuilding neighborhoods.
6. Restoring the Olmsted, Ellicott, and waterfront systems.
7. Protecting and restoring the urban fabric.

The Comprehensive Plan stresses the importance of adopting a form-based land use and zoning code (the City subsequently adopted the Green Code to implement the Comprehensive Plan) that will encourage reinvestment and reinforce the City's traditional neighbors that are walkable and mixed-use in nature. The Comprehensive Plan expressly encourages projects based on Smart Growth Principles to create healthy neighborhoods. The Comprehensive Plan calls for the City to adopt ten basic principles of smart growth as follows:

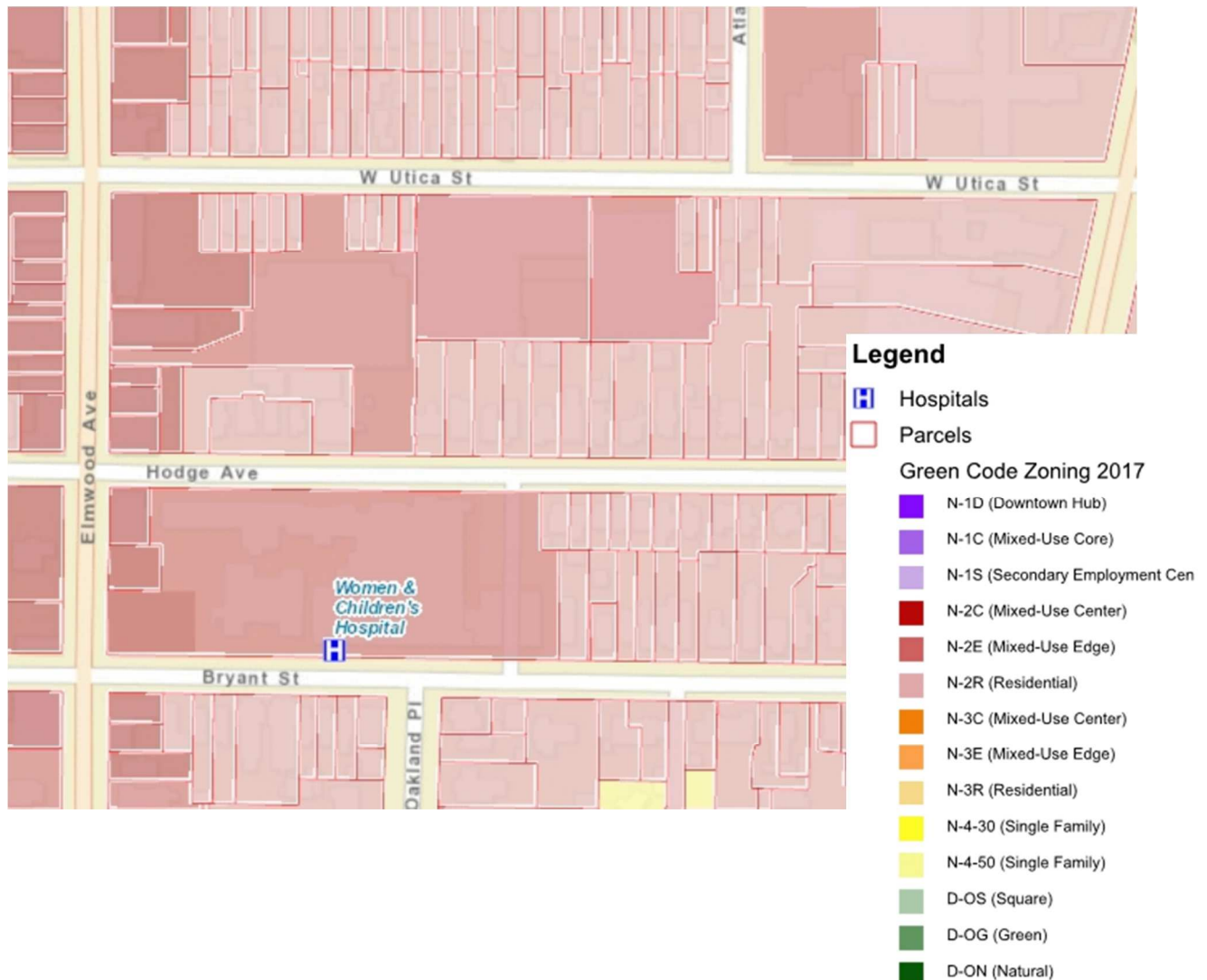
1. Mix land uses
2. Take advantage of compact building design
3. Create a range of housing opportunities and choices
4. Create walkable neighborhoods
5. Foster distinctive, attractive communities with a strong sense of place
6. Preserve open space, farmland, natural beauty, and critical environmental areas

7. Strengthen and direct development towards existing communities
8. Provide a variety of transportation choices
9. Make development decisions predictable, fair and cost-effective
10. Encourage community and stakeholder collaboration in development decisions.

The proposed mixed use redevelopment project is consistent with the above cited Smart Growth principles since it will result in a new mixed use building along the Elmwood Avenue frontage of the Site in a walkable neighborhood that will replace an existing surface parking lot at a prominent intersection. The overall project includes mostly the reuse of existing buildings for mixed uses, the creation of a new mixed use building that would service the new residential units and the neighborhood, and the creation of new types of denser housing for the neighborhood and the City.

Zoning – Unified Development Ordinance

The Unified Development Ordinance (“UDO”) is generally a form-based code with bulk requirements set by building type rather than by zone, and uses specified by zone. The Elmwood Crossing Site contains a mix of zoning classifications including N-2C (Mixed-Use Center), N-2E (Mixed-Use Edge), and N-2R (Residential).



The Project Sponsor will be seeking approval of a PUD from the City of Buffalo Common Council to lend uniformity to the zoning on the Elmwood Crossing campus to facilitate the proposed programming for the Site. See **Appendix L** - Zoning Map and Table 2.1.1.2 regarding permitted uses in each zone.

TABLE 2.1.1.2 – PERMITTED USES

	N-2C	N-2E	N-2R
Residential, including multiple unit	X	X	X
Lodging	X	X	
Schools	X	X	
Day Care	X	X	
Restaurants	X	X	
Grocery Stores	X	X	
Medical Clinics	X	X	
Retail	X	X	
Professional Offices	X	X	
Bed and Breakfast			X

The Project Sponsor intends to seek the approval of a PUD allowing the uses permitted in the N-2C district to be more uniformly applied across the Site. The PUD will also address bulk issues such as lot coverage, height, and transparency. We have prepared a detailed analysis of the existing use and bulk standards applicable to the various zoning districts on the Site. See UDO Analysis Chart in **Appendix M**.

Generally speaking, the PUD will seek to allow N-2C uses in a mixed use format across the site and specifically, with respect to height, the Applicants are seeking up to five stories and 66 feet in any area as part of the former hospital proper campus and three stories or 40 feet along Hodge. The more detailed elements of the PUD will accompany the submission to the Common Council.

2.1.3 Proposed Mitigation Measures

The entire purpose of the development is to blend consistency for development purposes against community concerns specific to the Site. The adoption of a PUD for the area will set standards going forward that match developer intentions with reasonable community expectations and consistency with surrounding development. Also, the adoption of a PUD for the Site will not obviate the need to comply with other zoning or building standards. The PUD, once approved based on the information in this DGEIS, will set many of the zoning parameters for the development of these sites.

2.1.4 Proposed Thresholds

If the uses and general layout of development are not in conformance with the PUD that is approved, a new PUD would be warranted and an environmental analysis that may result in the need for a SGEIS.

2.2 Utilities, Energy Use and Community Services

2.2.1 Potential Impacts

The development may cause adverse impacts to the existing infrastructure in the area, including energy resources. The project may cause a demand for community services (fire, emergency services, and police) that cannot be met.

2.2.2 Existing Conditions and Analysis

The utilities that currently serve the Site include water, sewer/stormsewer, electric and gas.

Water

The Buffalo Water Authority has provided hydrant test results indicating that adequate water supply (pressures and flows) is available to serve the Project. These hydrant tests are included in a new Appendix (in the FGEIS). According to the Federal Water Indices and Table 6.1 of ASPE Plumbing Engineering Design Handbook Volume 2, the typical Domestic water usage for hospitals is approximately 120 gallons per bed per day, with a demand factor of 0.25. The existing hospital contained approximately 185 beds. For Apartments, Office, Hotel Guest, and Hotel Employee it is 100, 15, 50, and 10 gallons per person per day and demand factors of 0.3, 0.3, 0.25 and 0.3 respectively. Since the building was built prior to the 1992 EPA Act mandate for fixture water consumption, it is likely that the volume of water for the same use today is approximately 30% less than it was when the building was constructed, simply because of the increased standards for today's water efficient fixtures.

Sewer/stormsewer

The Site is connected to a combined stormsewer and sanitary sewer system. The City of Buffalo Sewer Authority requires developers to increase the quantity of on-site stormwater detention during new construction or redevelopment specifically; developments must detain the difference in stormwater quantity between a 25-year storm post-development and a 2-year storm pre-development. Thus, the total volume that must be detained is equal to the volume associated with a 25-year storm (post-construction) minus the volume associated with a 2-year storm (pre-construction). Detention of stormwater means the Site's stormwater is held out of the combined sewer and slowly released, which can be done with green infrastructure and/or constructed systems. The storm year is a measure of the likelihood of that volume of rain occurring in one storm, therefore a 2-year storm happens more often, and has less volume, than a 25-year storm. The volume of water entering a storm system during a rain event is also impacted by the amount of impervious surface at a site. For instance, a typical grassy area will create less runoff than an impervious parking lot. As the amount of impervious surface on a site increases the amount of water that must be detained increases. Therefore, any future development must reduce the volume of stormwater leaving a site.

Most of the Site is currently covered with impervious surfaces (buildings and asphalt), with very little detention of stormwater or green space to help absorb rainfall. As a result, most of the Site's current stormwater is discharged into the combined stormwater and sanitary sewer system. Total existing on-site greenspace is approximately 1 acre.

The Project will double the amount of greenspace (to 2.18 acres) at the Site, which will help to reduce stormwater runoff. Figures showing the proposed landscaped areas and increase in greenspace are attached as **Appendix C**. If the increase in greenspace does not provide the required stormwater detention, a structure will be installed under the central greenspace as part of the Project's Phase 1 to detain additional volume. On-site detention of stormwater will be a

positive impact of the Project; less water will enter the combined sewer system during storms and will help reduce combined sewer overflows.

As each component of the project is designed and put forth for approval, it will require submission to the BSA to determine if the design meets BSA requirements. Based on correspondence from BSA and understanding the requirements of the City, these projects may require green infrastructure and other stormwater infrastructure other than just connecting to the wastewater system. Green infrastructure could include such things as pervious pavement, rain gardens, bio-swales, etc.

Electric and Gas

The existing structures on the Site are currently supplied by a primary electrical service that will have more than enough capacity to serve the redevelopment including the proposed new buildings. The Project Sponsor intends to provide a utility grade electrical sub-metering system to monitor all tenant's electrical consumption which is expected to be less than the previously more energy intensive hospital use of the site.

The natural gas service will likely be divided into multiple smaller utility services with a combined smaller total capacity than the existing gas service due to the lower energy intensity of the proposed redevelopment, as well as increased energy efficiency of new equipment. Looking at annual benchmark data for Hospitals in New York State, the typical electrical energy intensity is approximately 25.40 kWh/sf. As a comparison, the typical energy intensity in Multifamily, Small Office, and Retail, are 7.2, 15.9, and 14.6 kWh/sf respectively. [Reference: <http://members.questline.com/calccarbonfootprint.aspx> "Carbon Footprint Calculator" by National Grid, Source EIA energy intensity data from CBECS and MECS, EPRI, and other third party energy datasets.] This shows that the electrical demand of the proposed building is expected to be much less than the existing building.

Looking at annual benchmark data for Hospitals in New York State, the typical natural gas energy intensity is approximately 122.40 kBtu/sf. As a comparison, the typical energy intensity in Multifamily, Small Office, and Retail, are 38.20, 52.92, and 53.30 kBtu/sf respectively, well below the typical intensity of a hospital. [Reference: <http://members.questline.com/calccarbonfootprint.aspx> "Carbon Footprint Calculator" by National Grid, Source EIA energy intensity data from CBECS and MECS, EPRI, and other third party energy datasets.] This shows that the natural gas demand of the proposed building is expected to be much less than the existing building.

The Project Sponsor has prepared a comprehensive analysis of utility and energy demands for the Project as compared to the demands of the former hospital. As **Appendix N** generally depicts, the Elmwood Crossing Project will reduce across-the-board utility and energy demands as compared to the former hospital. This is due to a number of factors, including reduced intensity of uses and modern technology to help reduce the overall demands of the Project. For these reasons the Project will reduce impacts on Utilities and Energy resources.

2.2.3 Proposed Mitigation Measures

The Site's past hospital use required significant utility connections, so a lot of this infrastructure already exists. As the Project moves toward final design for each structure, additional coordination will occur with the utility companies to ensure adequacy of service, but no overall shortfall is expected given the density of uses at and surrounding the Site.

The Project Sponsor should work with appropriate utilities to ensure sufficient capacity to serve the Project.

Site Plans for the Project's future phases should ensure that greenspace/ green infrastructure is adequate to detain the required amount of stormwater (no increases in impervious surfaces). If additional detention measures and green infrastructure are necessary per the BSA, they will be implemented.

For public water, the applicant will have hydrant tests completed for each phase, to help ensure that no adverse impacts occur to the City's water system.

No other impacts were identified. Therefore, no additional mitigations are required.

2.2.4 Thresholds

For electric and gas, if the final Site Plan exceeds the figures analyzed here, an assessment of the incremental impact from the additional demand may be necessary. It should be understood that the power companies cannot guarantee future capacities; when projects are proposed, the demands will be analyzed, and if needed, improvements may need to be made.

The sewer/stormsewer report has set the threshold for development at 20% higher than the proposed square footages and units. Anything over that would require a re-look at the environmental impacts. All projects will need to be reviewed and approved by the BSA.

All proposed projects will require submittal of required information to the BWA, for analysis and determination of any specific needs/improvements.

2.3 Visual and Aesthetic Resources and Community Character

2.3.1 Potential Impacts

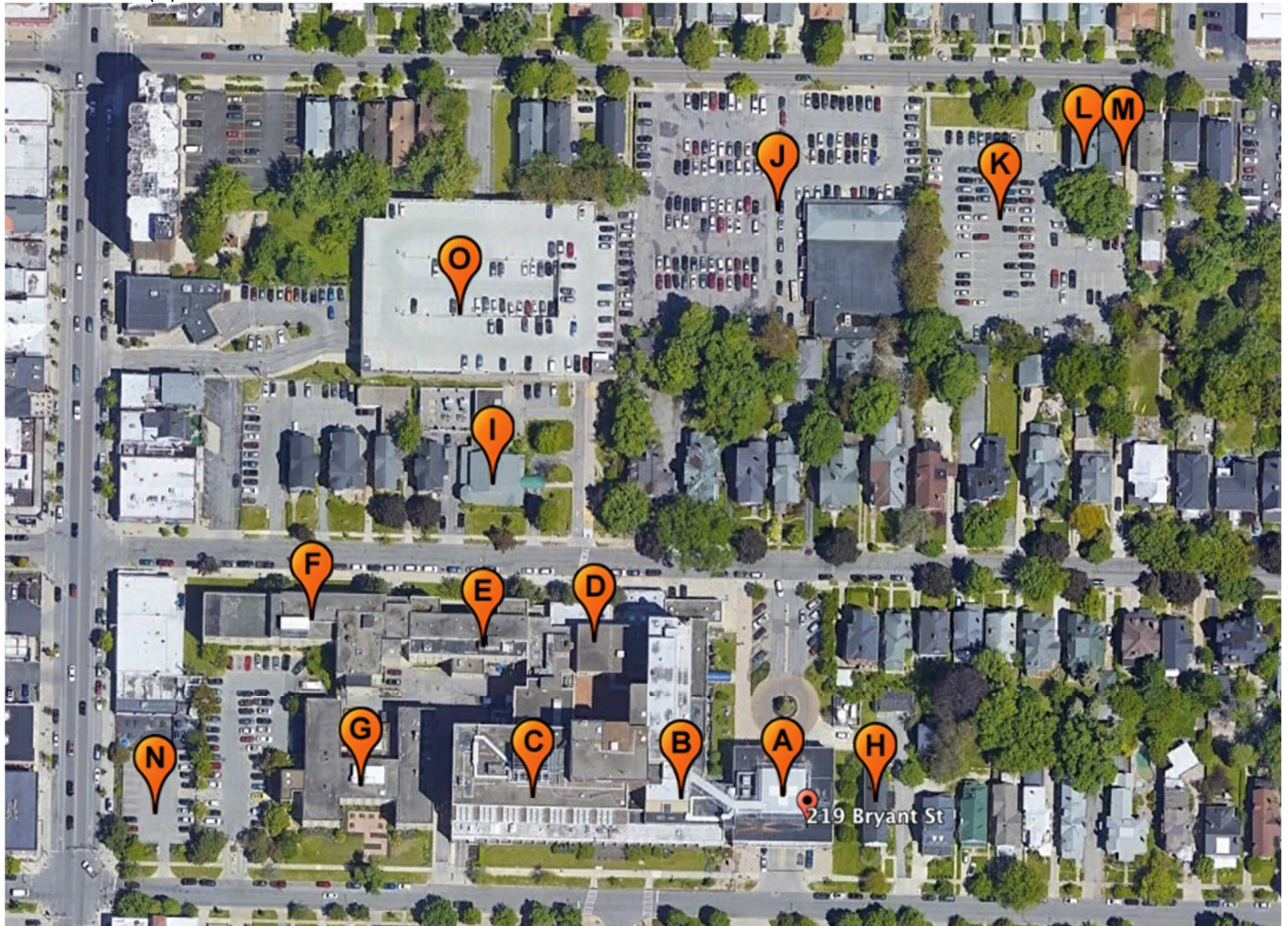
The proposed uses may be perceived as being inconsistent with the existing character of the neighborhood. The development may introduce new structures and site design within a well-established neighborhood.

2.3.2 Existing Conditions and Analysis

Visual Resources of Existing Site

The Site, the former Women and Children's Hospital of Buffalo, encompasses a series of interconnected buildings and land parcels. The campus was constructed over a time period starting in 1892 and continuing through a series of additions, demolitions and reconstruction projects that lasted almost 100 years. The final structure, Alfiero Building, was completed in 1995, punctuating the non-contiguous 7.9 acres of land. Ultimately, the final built environment of the core campus buildings provides approximately 617,000 sf of institutional health care and support structures, which include a wide variety of architectural styles, heights, densities and uses. Massing diagrams are provided as **Appendix P** to provide context of the existing and proposed development. See Figure 2.3(a) which follows.

FIGURE 2.3(a) VISUAL AND AESTHETIC CHARACTERISTICS OF SITE KEY MAP



KEY
A – Alfieri Building
B – Tanner Building
C – Variety Tower
D – C Building
E – D Building
F – MH Building
G – Annex Building
H – 187 Bryant
I – 125 Hodge
J – 204 West Utica
K – 188 West Utica
L – 184 West Utica
M – 180 West Utica
N – 451 Elmwood

O – Parking Garage

Table 2.3(a) provides a summary of the notable visual and aesthetic characteristics of the major site components that exist today. The most dominant features of the Subject Site are two mid-rise towers, known during operation as the Tanner and Variety Towers, which face Bryant Street, yet are visible throughout the surrounding neighborhood. Along Hodge Street are lower profile, low-rise structures, known previously as the C/Service, D/Dispensary and M/H / Maternity, with architectural features typical of early twentieth-century style institutional architecture. Additionally, another early twentieth-century institutional style low-rise structure faces Bryant and was previously known as the Nurses' Building/Annex Building.

Further elements of the built Site include two residential-to-commercial conversion structures at 187 Bryant Street. Other structures include single- or two-story supporting masonry block buildings, including power and maintenance buildings, medical office buildings, a vacant masonry block commercial building and paved parking lots and vehicular driveways.

This Site is wedged over multiple blocks, jaggedly interwoven between Elmwood Avenue to the west, Bryant Street to the south, West Utica to the north, and a linear projection of Atlantic Avenue to the east, bordered by the Elmwood Strip. The underutilized parcels and existing commercial block buildings on Utica create a vacant expanse that interrupts the existing streetscape, which is out of character with the densely built environment. Site components also include a four-story, concrete parking structure with entrance points from Elmwood Avenue, Hodge Avenue and West Utica Street.

Building Identifier	Structural (SF)	Width (Ft)	Stories	Setback (Ft)	Notable Characteristics
Alfiero (A)	30,300	102'	2	25'	Newest structure, with a footprint of 12,400 sf, facing Bryant. Dominant characteristics are cement façade, with glass block windows. Constructed in late 20 th century, bridging over a vehicular driveway, with a roof helipad. Entranceway is internal.
Variety (C)	260,750	200'	10	25'	Institutional style tower, facing Bryant; Footprint of 37,200 sf. Dominant characteristics are typical to the early 1970's time period of construction, with brown brick facade and vertical pre-cast concrete. A loggia faces Bryant Street. The main entrance is from an internal site pedestrian drop-off.
Tanner (B)	134,120	82'	9	25'	Institutional style tower, perpendicular to the Variety Tower, with a footprint of 14,500 sf. Features architectural styling typical to the completion period in 1952, with a yellow brick exterior, and horizontal window bands. Building entrance is from an internal courtyard.
C Building (D)	47,000	203'	4	10'-30'	Tan brick structure constructed and reconstructed over three decades, with a 12,500-sf footprint. Features are unremarkable, with the exception of a visible boiler room encasement. Faces Hodge with covered entranceway.
D Building (E)	34,000	123'	4	12'-28'	U-shaped tan brick structure constructed in 1927, with a Footprint of 6,800 sf. Distinguishing features include a loggia, with Corinthian columns, facing Bryant.
MH (F)	57,000	214'	4	12'	Tan brick structure, constructed in 1927, with later substantial renovations. It occupies a footprint of 12,500 sf. The Fourth level is clad in metal paneling and stepped back. A covered entranceway, from Hodge, exists.
Annex (G)	54,000	156'	3	37'-60'	"H" shaped, tan brick structure, constructed in 1911, with an addition in 1927. The footprint is 12,500 sf, and design is consistent with early twentieth century institutional architecture. Entrance is through a parking lot, with a courtyard facing Bryant Street

187 Bryant (H)	4,291/ 1,665	22'	2	28'	Traditional style residential structure converted for commercial use with an accessory unit in rear. Entrance from Bryant.
125 Hodge (I)	5,474	67'	2	24'	Commercial office building, with traditional style and gabled roof. Originally constructed in 1996, with drive-through drop off entrance.
204 W. Utica (J)	10,954	105	1	107'	Single-story concrete masonry block style building
188 W. Utica (K)		160'	NA	NA	Asphalt paved land parcel. Full frontage interrupted by two single-family homes.
184 W. Utica (L)	2,592	26'	2	8'	Traditional style single family home
180 W. Utica (M)	2,968	22	2	8'	Traditional style single family home
451 Elmwood (N)	3,329	40'	1	0'	Commercial building and gated parking
Parking Garage (O)	191,264	180'	4	246	4-level concrete parking garage

TABLE 2.3(a) VISUAL AND AESTHETIC CHARACTERISTICS OF SITE

2.3.1.2 Visual Characteristics of Surrounding Neighborhood

Surrounding the Site is an extremely diverse range of building structural types and uses. The site lies in three Zones, as identified in the City of Buffalo Unified Development Ordinance. They are N-2C (Mixed-use Center), N-2E (Mixed-use Edge) and N-2R (Residential). See Figure 2.3(b) and Table 2.3(b) below.

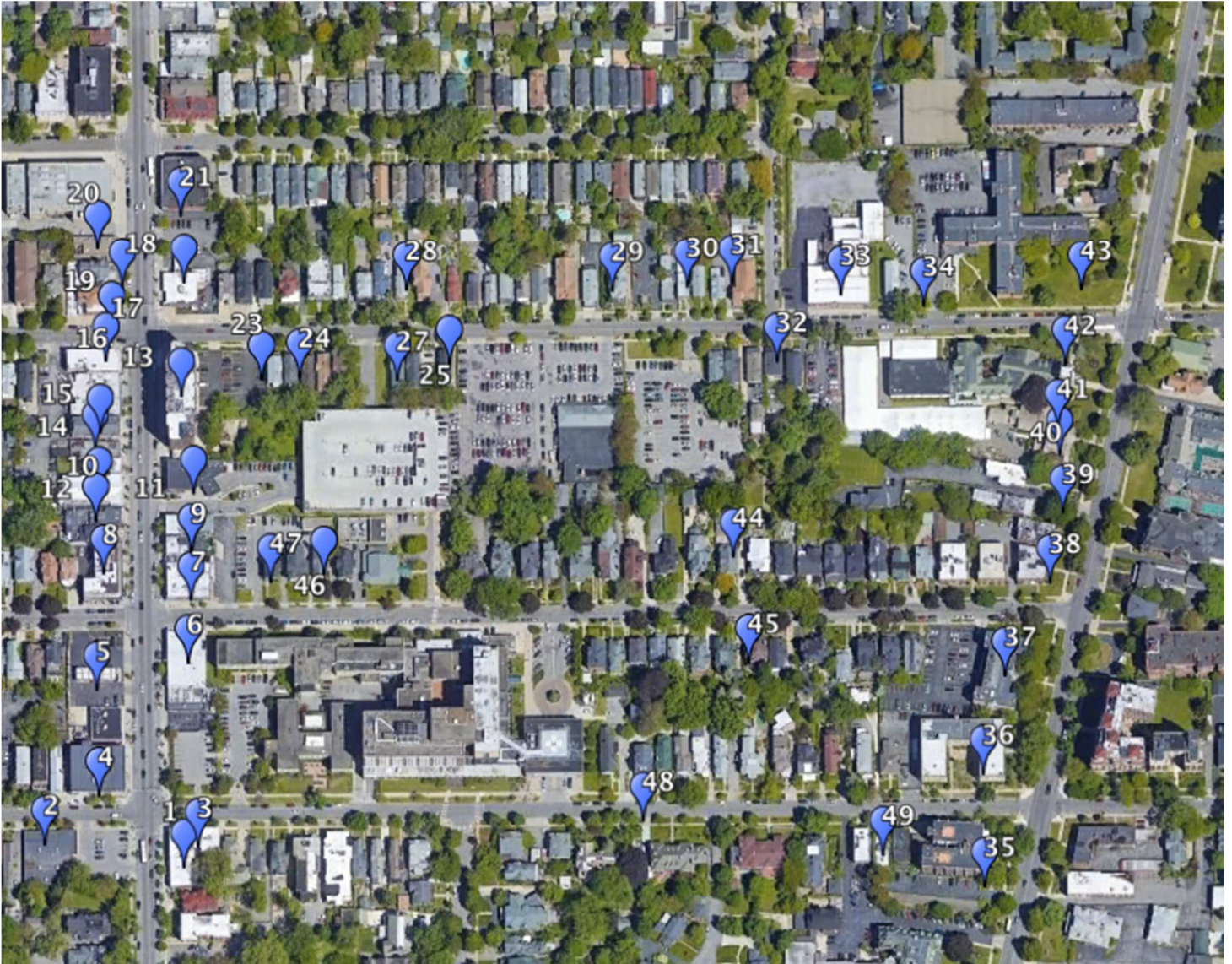


FIGURE 2.3(b) VISUAL CHARACTERISTICS OF SURROUNDING NEIGHBORHOOD MAP

MAP KEY - SAMPLE VISUAL CHARACTERISTICS OF SURROUNDING NEIGHBORHOOD KEY MAP

ID	ADDRESS	ID	ADDRESS
		24	246-256 W Utica (5)
1	423 Elmwood	25	230 W Utica (3)
2	424 Elmwood	26	234 W Utica
3	427 Elmwood	27	236-238 W Utica
4	448 Elmwood	28	207-261 W Utica (17)
5	456 Elmwood	29	203 W Utica
6	459 Elmwood	30	183-197 W Utica
7	471 Elmwood	31	181 W Utica
8	478 Elmwood	32	170-176 W Utica
9	481-487 Elmwood	35	888 Delaware
10	492 Elmwood	36	916 Delaware
11	493 Elmwood	37	938 Delaware
12	494-500 Elmwood	38	950 Delaware
13	501 Elmwood	39	960 Delaware
14	502 Elmwood	40	964 Delaware
15	504 Elmwood	41	976 Delaware
16	520 Elmwood	42	1000 Delaware
17	528 Elmwood	43	1014 Delaware
18	531 Elmwood	44	19-107 Hodge (19)
19	534 Elmwood	45	28-84 Hodge (14)
20	538 Elmwood	46	135 Hodge
21	541 Elmwood	47	137-143 Hodge
22	459 Elmwood	48	139-183 Bryant (11)
23	258 W Utica	49	142-143 Bryant

TABLE 2.3(b) SURROUNDING STRUCTURE TYPES

ADDRESS	TYPE	NO. STORIES	DOMINANT MATERIALS
423 Elmwood	Commercial	2 Story	Brick
424 Elmwood	Commercial	1 Story	Masonry Block
427 Elmwood	Commercial	2 Story	Brick
448 Elmwood	Mixed-use	3 Story	Cement and glass
456 Elmwood	Gas Station	1 Story	Brick
459 Elmwood	Commercial	2 Story	Brick
471 Elmwood	Commercial	2 Story	Brick
478 Elmwood	Mixed-use	2 Story	Brick
481-487 Elmwood	Mixed-use	2 Story	Brick
492 Elmwood	Restaurant	2 Story	Brick
493 Elmwood	Commercial	1 Story	Brick
494-500 Elmwood	Mixed-use	2 Story	Brick
501 Elmwood	Multifamily	10 Story	Brick
502 Elmwood	Commercial	1 Story	Brick
504 Elmwood	Mixed-use	3 Story	Brick
520 Elmwood	Commercial	1 Story	Concrete and glass
528 Elmwood	Commercial	2 Story	Wood
531 Elmwood	Commercial	1 Story	Brick
534 Elmwood	Commercial	2 Story	Wood

538 Elmwood	Utility	1 Story	Brick
541 Elmwood	Commercial	2 Story	Brick
459 Elmwood	Commercial	2 Story	Brick and glass
258 W Utica	Vacant Land	NA	NA
246-256 W Utica (5)	Residential <5U	2 Story	Wood
230 W Utica (3)	Residential <5U	2 Story	Wood
234 W Utica	Vacant Land	NA	NA
236-238 W Utica	Residential <5U	2 Story	Wood
207-261 W Utica (17)	Residential <5U	2 Story	Wood
203 W Utica	Mixed Use	2 Story	Wood and brick
183-197 W Utica	Residential <5U	2 Story	Wood
181 W Utica	Commercial	2 Story	Brick
170-176 W Utica	Residential <5U	2 Story	Wood
169 W Utica	Commercial	2 Story	Brick
151 W Utica	Commercial	2 Story	Wood
888 Delaware	Multifamily	5 Story	Brick
916 Delaware	Multifamily	5 Story	Brick
938 Delaware	Commercial	4 Story	Brick
950 Delaware	Multifamily	3 Story	Brick
960 Delaware	Single Family Home	1 Story	Brick
964 Delaware	Commercial	3 Story	Brick
976 Delaware	Commercial	2 Story	Brick
1000 Delaware	Religious Use	3 Story	Stone
1014 Delaware	Health care	4 Story	Brick
19-107 Hodge (19)	Residential <5U	2 Story	Brick
28-84 Hodge (14)	Residential <5U	2 Story	Brick
135 Hodge	Single Family Home	2 Story	Wood
137-143 Hodge	Commercial	2 Story	Brick
139-183 Bryant (11)	Residential <5U	2 Story	Wood
142-143 Bryant	Residential <5U	2 Story	Wood

Adjacent to the campus, to the west, sits Elmwood Avenue, which is dominated on the adjacent block by two-story commercial buildings with retail and restaurant as the most common type of uses. A 12-story mixed use building (residential and retail) is located at Elmwood and West Utica Street, just west of the project site. Delaware Avenue is approximately 700 feet east of the project. Major intersections with Delaware Avenue are characterized by larger structures with use types that include mid-rise multifamily, religious and health care facilities. On streets surrounding the site, there is a preponderance of traditional housing types of one- to four-family units. These housing types are in a variety of traditional styles, ranging from smaller, more modest homes, to grand homes with extensive architectural detail. Materials are generally wood frame and/or brick. Westward past Elmwood Avenue, residential uses dominate, with a few small businesses also found. Eastward toward Delaware Avenue, residential structures are typically two to three stories in height. **Appendix F** provides visual images of representative buildings in the surrounding neighborhood.

The visual and aesthetic impacts of the Project will mimic much of the existing built environment, based on the Project's reuse of more than 90% of the existing structures. As illustrated above, the surrounding environs have substantial diversity in building type and style. The proposed Project continues to invoke a variety of structural styles, while introducing

activation of parking lots, and an increase in visible entrance points to structures. The Applicant has attached design concepts as **Appendix K**.

At completion, there will be a net increase in structural density to the Site of approximately 200,470 sf. There will also be an increase in the amount of building façade. The greatest impacts will occur with the addition of a five-story, 67,700 sf building at the corner of Elmwood and Bryant, where currently a parking lot sits, along with the new construction of townhomes and a mixed-use new construction along West Utica Street, also where a parking lot and abandoned building exist. See Tables 2.3(c) and 2.3(d) below.

TABLE 2.3(c): APPROXIMATED VARIATION IN STRUCTURAL CHANGE OF SITE

PROJECT	INCREASE	DECREASE	NET CHANGE
187 BRYANT: Green Space		5,956	
PROJECT 1: Mixed use	67,700		
PROJECT 2: Daycare	5,726		
PROJECT 3: Townhomes	50,000	3,200	
PROJECT 4: Mixed-use	123,000		
PROJECT 5: Historic		40,000	
PROJECT 6: Towers			Unchanged
PROJECT 7: Parking			Unchanged
TOTAL INCREASE			197,270

TABLE 2.3(d): APPROXIMATED VARIATION IN FAÇADE LENGTH OF SITE

PROJECT	INCREASE	DECREASE	NET CHANGE
187 BRYANT: Green Space		26'	
PROJECT 1: Mixed use	190'		
PROJECT 2: Daycare			unchanged
PROJECT 3: Townhomes	145'		
PROJECT 4: Mixed-use	170'		
PROJECT 5: Historic		25'	
PROJECT 6: Towers			unchanged
PROJECT 7: Parking			unchanged

BUILDING HEIGHTS

While those structures greatest in height (the former Tanner and Variety Towers) will remain unchanged, the addition of four- and five-story buildings will have a visible impact. Please see Table 2.3(e) for a full review of changes to Building Heights.

TABLE 2.3(e): APPROXIMATED CHANGE IN NUMBER OF BUILDING STORIES OF SITE

PROJECT	CURRENT	NEW	
187 BRYANT GREEN SPACE	2	0	
PROJECT 1: Mixed use	0	5	
PROJECT 2: Daycare	2	2	
PROJECT 3: Townhomes	0	2	
PROJECT 4: Marketplace	1	4	
PROJECT 5: Historic	4	unchanged	
PROJECT 6: Towers	10	unchanged	
PROJECT 7: Parking	4	unchanged	

ENTRANCES

The current configuration of the Site structures has visible major entrance points to the buildings as described in Table 2.3(f).

TABLE 2.3(f): APPROXIMATED CHANGE IN BUILDING ENTRANCE POINTS OF SITE

Street	Number of Entrances	Projected Number of Entrances
Hodge	5	5
Bryant	4	4
West Utica	2	12
Elmwood	0	4

The Site's redevelopment will increase the number of visible building entrances on West Utica and Elmwood. This is anticipated to be a positive impact. The number of building entrances along Hodge and Bryant are anticipated to have little change.

SETBACKS

The Site will experience the greatest change with the addition of structures on West Utica, with both townhomes and mixed-use structures being constructed near the right of way. See Table 2.3(g) below. Both Project components will be at or near the public right of way, with minimal setbacks, where currently the existing structure is set to the rear of the lot, and the adjacent parcel has no structure.

TABLE 2.3(g): APPROXIMATED CHANGE IN SETBACKS OF SITE

Street	Setback
Hodge	Unchanged
Bryant	Unchanged
188/204 West Utica	Decrease; to Lot line
451 Elmwood	Decrease; to Lot line

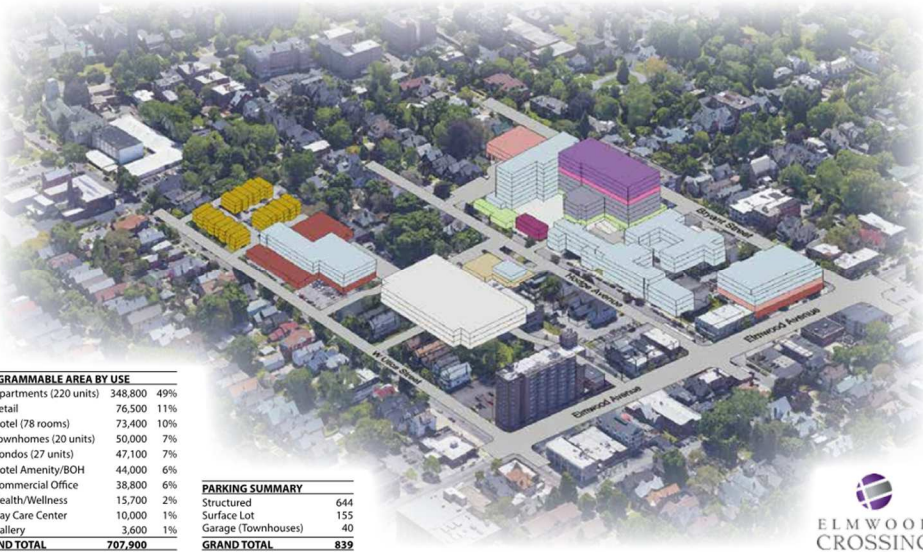
The project does not introduce significant visual change to the neighborhood because the project entails primarily the re-use of existing structures. The largest visual changes will occur along West Utica with the construction of the four story mixed use building and the new townhouses. The mixed use building will be constructed in an area that presently includes a vacant commercial building and a large surface parking lot. As seen below, this structure will be placed between the Gallagher Parking ramp and the new townhouse and is designed to fit into the character of the neighborhood. The upper residential floors will step back, softening the impact on the street and neighboring properties. The townhouses have units facing West Utica and include a design aesthetic that fits in with the residential look of the existing structures. The remaining townhomes are tucked in behind the frontage units (see following figure).

Elmwood Crossing Program Massing Overlay

PROGRAMMABLE AREA BY PROJECT	
Project 1: 451 Elmwood	67,700
Level 1: Retail	13,300
Level 2: Commercial Office	14,500
Levels 3-5: Apartments (22 units)	39,900
Project 2: 125 Hodge	11,200
Level 1: Day Care Center	10,000
Level 2: Apartment (1 unit)	1,200
Project 3: Utica Townhomes	50,000
Townhomes (20 units)	50,000
Project 4: Utica Marketplace	123,000
Level 1: Grocery Store & Retail	45,000
Levels 2-4: Apartments (48 units)	78,000
Project 5: Historic Reuse	144,800
Building C Levels 1-2: Gallery	3,600
Building C Level 1: Hotel Amenity/BOH	3,400
Building D: Apartments (27 units)	29,700
Building M/H: Apartments (37 units)	56,600
Annex Building: Apartments (36 units)	51,500
Project 6: Variety/Tanner/Aliero	311,200
Variety Levels 1-2: Hotel Amenity/BOH	40,600
Variety Levels 3-6: Hotel (78 rooms)	73,400
Variety Level 7: Health/Wellness	15,700
Variety Levels 8-10: Condos (27 units)	47,100
Tanner Level 1: Retail/Restaurant	18,200
Tanner Levels 2-9: Apartments (49 units)	91,900
Aliero Levels 2-3: Commercial Office	24,300
GRAND TOTAL	707,900

PROGRAMMABLE AREA BY USE		
Apartment (220 units)	348,800	49%
Retail	76,500	11%
Hotel (78 rooms)	73,400	10%
Townhomes (20 units)	50,000	7%
Condos (27 units)	47,100	7%
Hotel Amenity/BOH	44,000	6%
Commercial Office	38,800	6%
Health/Wellness	15,700	2%
Day Care Center	10,000	1%
Gallery	3,600	1%
GRAND TOTAL	707,900	

PARKING SUMMARY	
Structured	644
Surface Lot	155
Garage (Townhouses)	40
GRAND TOTAL	839



2.3.3 Proposed Mitigations Measures

Community stakeholder and government agencies will have the opportunity to participate in the public process through the City of Buffalo's Site Plan Approval Process. This forum will allow for discussion on final structure footprints, ingress and egress points, materials and use. Building heights will not exceed the existing ten stories and those shown on the draft plans. Actions will be taken to minimize the building height impacts of new construction in excess of three stories by stepping back upper levels (this will also reduce any shadow effects to surrounding properties- minimal as they will be for the 3 to 4 story structures) See **Appendix P**.

Building density will be mitigated through design of active and pedestrian scaled entrances that are mindful of the pedestrian environment along with multi-modal transportation use. The Project Sponsor has proposed the removal of the structures at 187 Bryant and adding pedestrian paths to decrease the impacts of density. The Project Sponsor has engaged a landscape architect to provide thoughtful consultation on design that will mitigate the impacts of height, density and facades. See **Appendices "A" and "C"**.

2.3.5 Proposed Thresholds

No new structures will be planned in excess of five stories. In cases where density, setbacks or building heights exceed those thresholds examined herein, additional assessment of those impacts will be provided.

2.4 Socioeconomic (Including Environmental Justice)

2.4.1 Potential Impacts

There were no potential socioeconomic environmental impacts identified in scoping.

2.4.2 Existing Conditions and Analysis

The Site sits in U.S Census Tract 66.02. A full census report for the tract can be found at www.census.gov. According to a demographic profile generated through Co-Star (See

Appendix Q) total population within a one-mile radius of the Site is 35,625. The number of households is 18,165. Demographic characteristics of the Site population include an average population age of 38 years old, living in a Household size of 1.9 persons, with a Median Household income of \$38,612. Over 60% of the tract (61.9%) of the population is White, with the second largest racial group being African American with 26.1% of the population. Within the one-mile radius, there are 2,616 business and 48,659 employees. The average household within the one-mile radius has a consumer spending level of \$18,471 annually. Within Census Tract 66.02, 16.6% have an income level that is at or below the poverty line. See Demographic Overview at **Appendix Q**.

The Site does not sit in a Potential Environmental Justice Area.

Substantive impacts to socioeconomic characteristics of the area are not anticipated. The greatest change will be added population of a projected 603 people (depending on the type of projection that is utilized – for this figure the census data for average household size was used), which is not anticipated to have a relevant statistical impact on population levels (approximately 1.35%). Therefore, no adverse impacts are present.

2.4.4 Mitigations and Thresholds

There are no mitigations or thresholds proposed, based on there being no adverse impact.

2.5 Air Quality

2.5.1 Potential Impacts

There were no potentially significant adverse environmental impacts identified in the scoping document. The following information documents why there are no significant environmental impacts to Air Quality.

2.5.2 Existing Conditions and Analysis

The Buffalo-Niagara Falls Metropolitan Statistical Area has been determined to be in attainment for all components of the National Ambient Air Quality Standards. The region is therefore in compliance with all pollution control standards set as part of the Clean Air Act.

The Site's Power Plant, constructed in 1973, generated heat and steam for the entire 900,000 sq. ft hospital complex and currently operates at a reduced capacity to help maintain the buildings during vacancy.

The Project Sponsor plans to obtain the smallest adequate heating and cooling units for the new buildings, but final specifications for the equipment are not available to determine total output. The units may produce some air emissions, but any impacts will be below the threshold at which an Air Permit is required from the NYSDEC. However, an Air Registration will be completed with the NYSDEC if needed.

In general, the project is a sustainable project with the primary reuse of existing structures, and will generate less greenhouse gases with the installation of modern HVAC equipment. The project site will be well connected into the neighborhood and create a walkable neighborhood

that will help to reduce car trips. The project, due to its design will be climate smart and not negatively impact climate change.

2.5.4 Mitigation Measures

If the building heating and/or cooling units require air registration it will be obtained from the NYSDEC as required. No other impacts were identified and therefore, no additional mitigations are required.

2.5.5 Thresholds

If any use is proposed that would require an Air Quality permit, then the project would have to be re-evaluated under SEQRA.

2.6 Public/ Human Health

2.6.1 Potential Impacts

The site will be subject to environmental remediation and the improper development of the site may create public health issues, if not properly addressed.

2.6.2 Existing Conditions and Analysis

The Site has shown evidence of past environmental impacts and existing buildings may contain asbestos containing materials (“ACM”) and lead paint. There is evidence of past petroleum spills associated with former fueling tanks which were used to heat the hospital complex and support the backup generator. ACM and lead paint have been identified in various locations throughout the complex due to the age of the structures.

While there is no evidence of public exposure to the existing environmental conditions on the Site, all of these issues will need to be managed properly to prevent exposure during construction and/or demolition. The NYS Brownfield Cleanup Program (BCP) has multiple levels of protection required for on-site and off- site human health and the environment. All environmental investigation and remediation are to be completed under the supervision and approval of the NYSDEC and the NYSDOH (with numerous requirements for public review and notifications). Part of the BCP requirements include the preparation of a comprehensive Health and Safety Plan (HASP) that includes the NYSDOH Community Air Monitoring Plan.

For the areas of the site that do not fall under the BCP, the applicant/contractors will utilize the SWPPP and dust control methodologies to prevent exposure to environmental contaminants during demolition and construction. These methodologies will be the responsibility of the contractor, as directed in the construction bid specifications. Methodologies include following material safety data sheets, temporary barricades, weather protection, temporary enclosures, wetting of materials, etc.

2.6.3 Mitigation Measures

The Project Sponsor has placed the Project into the New York State Brownfield Cleanup Program (“NYSBCP”). See NYSBCP Application at **Appendix R** and correspondence with

NYSDEC at **Exhibit S**. The impacted soils at the Site will be remediated under the supervision of the NYSDEC and remediated to a Restricted Residential-classification cleanup standard, as defined in DEC's 6 NYCRR Part 375 Soil Clean up Objectives. It is expected that if there is any potential for exposure to existing subsurface conditions the Site will be cordoned-off and air monitoring will be installed to ensure there is no risk of public exposure to the existing contaminants.

With respect to the ACM and lead paint, the materials will either be removed or encapsulated, depending upon the condition and location (per the BCP and HASP discussed previously). Interior remedial measures will be conducted in accordance with all state and local standards to prevent any potential exposure.

In all cases, all hazardous materials removed from the Site will be transported off-site to a proper disposal facility.

2.6.4 Thresholds

Waste removal activities will be conducted in accordance with all applicable regulations. No thresholds for waste removal are warranted to achieve the intended environmental benefit.

2.7 Public/Community Services

2.7.1 Potential Impacts

The Project may create a demand for community services (fire, emergency services, and police) that cannot be met.

2.7.1 Existing Conditions and Analysis

The Project is located in the City of Buffalo, where the Subject Site is served by the following primary public services:

- Buffalo Public Schools
Note: Buffalo Public Schools have school choice, and no singular school will receive any student population based on that. Charter schools, along with private and parochial schools also serve the entire district, and are not limited to neighborhood.
- City of Buffalo Fire Department
Engine 37
500 Rhode Island
Buffalo, New York 14213
- Buffalo Police Department
District B
695 Main Street
Buffalo, NY 14203
- Buffalo and Erie County Public Library
Crane Branch
633 Elmwood
Buffalo NY, 14222
- City of Buffalo Department of Public Works

- Buffalo Sewer Authority
- Buffalo Water Authority

Other public services may be available to the Site based on unique need.

The Project is not anticipated to produce a significant increase on demand for any public services. At the projected level of residential units, a reasonable projected population for the project, based on 2.26 persons per household is 603 new residents (as noted previously, depending on the population projection methodology utilized, this number can vary from 480 to 675 people). Of those residents, 241 - 270 could reasonably be projected to be minors. Based on these population projections, the population at the site is not significant enough to have an impact on public services. Based on the prior use of the Subject Site, new uses are anticipated to provide less demand for public services such as energy, water and sewer (see Utility section). Those additional public services noted are not expected to be impacted by the project in a significant way.

Therefore, the impacts are not adverse.

2.7.3 Mitigations and Thresholds

Because no adverse impact are identified, no mitigations are required.

The no impact is based on the proposed number and type of uses/users, therefore the City will need to monitor these numbers as the project is developed and if an estimate is exceeded, further review may be warranted.

2.8 **Construction Impacts**

2.8.1 Potential Impacts

The project will be constructed over an extended period of time, and construction related impacts will therefore occur over an extended period of time (and there are issues relating to environmental contamination at the site).

2.8.2 Existing Conditions and Analysis

There are currently no specific sensitive receptors (e.g. retirement homes, schools or child care facilities) in the immediate vicinity of the Site. Adjacent to the campus, to the west, sits Elmwood Avenue, which is presently dominated on the adjacent block by small scale commercial buildings with retail and restaurant as the most common type of use. On major intersections within a range of less than 700 linear feet to the former Woman and Children's Hospital of Buffalo campus, larger structures with use types that include mid-rise multifamily, religious and health care facilities exist. On streets surrounding the site, there is a preponderance of traditional housing types of 1-4 family units.

Thorough environmental testing has been completed at the Site.

It has been determined that most of the existing buildings on the Site contain lead and/or asbestos laden materials. While only a small portion of the Site will be fully demolished, the reprogramming of all remaining structures through interior demolition and substantial

renovations, will result in lead and asbestos abatement work. See the Demolition Details at **Appendix T**.

It has also been determined through testing that subsurface contamination is present at Project #3 (188 W Utica Street) and Project #4 (204 W Utica Street). Both sites have been accepted into the NYS Brownfield Cleanup Program. See **Appendix R**.

The following is a more thorough discussion of these potential construction impact types:

Demolition

Conventional demolition methods will be used for any demolition on the Site. Following demolition and interior cleanout of the structures to remain, materials from the Site will be recycled if possible, and remaining materials will be disposed of in licensed landfills. During any demolition, the contractors will utilize City required dust control measures (water, etc.).

Vehicle Access

Construction activity across Sites 2 – 7 (Site #2: 125 Hodge, Site #3: 188 West Utica, Site #4: 204 West Utica, Site #5: Former “MH” and “D” Buildings on Hodge Avenue and Annex “A” Building on Bryant Street, Site #6: “Core Campus” – Former Variety and Tanner Towers, Alfiero and “C” Building Complex, and Site #7: 489 Elmwood Avenue – Gallagher Parking Ramp) are estimated to last approximately 30 months in total. A construction office will be located on-site for each Project Phase.

Staging of materials related to new construction activity will occur at various on-site locations. Deliveries to the Site will originate from Elmwood and Delaware Avenue and enter the Site from Utica, Hodge and Bryant Street. Prior to construction of each Project Phase, a specific traffic plan will be developed to ensure that traffic is properly routed.

The Gallagher parking ramp (Project #7) along with the various off-street parking lots on the Site, will be used for construction worker parking, which will be large enough to accommodate all workers. Construction workers will likely use Elmwood Avenue, Hodge Street and Utica Street to access available off-street parking, but this will be limited to early morning and evening and will not be a significant impact.

Noise and Air Quality

Exterior construction will occur only between 7 AM and 7 PM to reduce potential impacts to surrounding residents. To control noise and limit air impacts, all vehicle idling will be limited to no more than five minutes, as per NYSDEC requirements. The contractors will also follow all of the requirements under the HASP and dust control requirements of the City.

There are presently no specific sensitive receptors (retirement homes, schools or child care facilities) in the immediate vicinity of the Site. The daycare will not be under construction or operation until at least 2020 and there are no planned schools or retirement homes on-site. Therefore, no additional impacts are expected to these groups.

2.8.3 Mitigation Measures and Thresholds

The construction management team to be assembled for Elmwood Crossing will recognize those properties with the highest potential sensitivity to construction activity whether adjacent to or within the overall Elmwood Crossing development site. Furthermore, as individual projects become complete and undergo phased occupancy within Elmwood Crossing prior to the completion of all development work, special care will be given to so not to disrupt the health and

safety of the new activity on site including but not limited to residents, commercial tenants and their employees, early childhood care, business patrons and guests.

To minimize adverse impacts from construction activity including but not limited to noise, dust and traffic to the extent practicable on these nearby properties, the following mitigation measures will be implemented during demolition and construction:

Demolition

- Prior to demolition, all hazardous materials will be removed from the buildings
- Appropriate demolition permits will be obtained from the City of Buffalo
- Dust control measures will be implemented
- Demolition will occur only during daytime hours
- The Project Sponsor will keep in contact with local community groups to provide them with demolition and construction updates

Construction

- A traffic and vehicle access plan will be prepared and used for worker and delivery access to the Site.
- Exterior construction will occur only between 7 AM and 7 PM, and any deviations will be communicated to neighborhood residents in advance
- Erosion and sedimentation control methods will be employed to ensure that sediment does not leave the Site
- The Project Sponsor will continue contact with local groups throughout the construction process
- Additionally, the Project Sponsor has prepared a Construction Projection Plan which is reflective of the measures and attached hereto at **Appendix U**.
- Construction hours will be 7 AM to 7 PM.

Thresholds

If demolition or exterior construction operations are scheduled to occur outside of the 7 AM – 7 PM work day period, additional impact analysis may be required.

2.9 Historic, Archeological and Cultural Resources

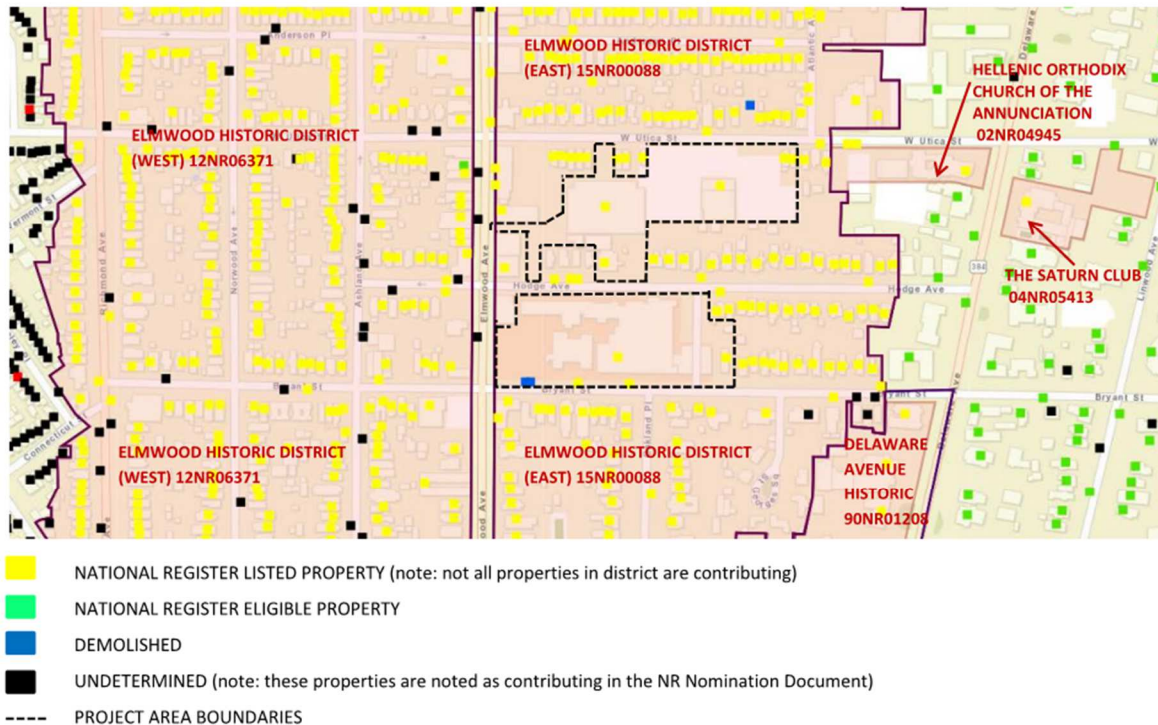
2.9.1 Potential Impacts

The site is located within the Elmwood Historic District East (15NR0008) and potential impacts to this resource could occur. Potential impacts to archeological resources could also occur.

2.9.2 Existing Conditions and Analysis

The Site includes contributing and non-contributing resources to the National Register Listed Elmwood Avenue Historic District (East) (15NR00088, listed 3/22/2016), within which the Site is located. A detailed Cultural Resource Report is attached as **Appendix V**, which includes maps and photographs of contributing resources. A map of the identified resources (see Figure 2.9.1 below).

FIGURE 2.9.1 – CULTURAL RESOURCE MAP



The former Women and Children's Hospital of Buffalo, located at 219 Bryant Street is a contributing resource; however, the complex is made up of seven interconnected portions, not all of which are contributing. The contributing portions are the "Service Building and Boiler Room" (1917); The Annex Building, "Nurses Home" (1917, 1927-1928); the "Dispensary Building" (1927-1928); the "Maternity Building" (1927-1928); the Tanner Building (1952-1954), and the addition to the "Maternity Building" (1960). The non-contributing portions of the former Women and Children's Hospital of Buffalo are the Variety Tower (1970-1972) and the Alfiero addition (1996). Other contributing resources in the Elmwood Avenue Historic District (East) are the residence and carriage house at 187 Bryant Street, and the residences at 180 and 184 West Utica Street. The non-contributing resources are the former Hodge Pediatrics at 125 Hodge Avenue, Gallagher Parking Ramp at 489 Elmwood Avenue, and the commercial building at 204 West Utica Street.

In addition to the National Register Listed Elmwood Avenue Historic District (East), within which the Project Area is located, the Project Area is adjacent to the National Register Listed Elmwood Avenue Historic District (West) (12NR06371, listed 12/04/2012) and Delaware Avenue Historic District (90NR01208, listed 1/17/1974). Furthermore, there are two Certified Local Historic Districts near the Project Area including the Delaware Avenue Local Historic District and the Linwood Avenue Local Historic District.

The National Register listed and Certified Local Historic Districts noted above have numerous National Register listed and National Register eligible properties. In addition to the Site, the survey evaluated viewsheds into and out of the immediate survey/Site along Elmwood Avenue, West Utica Street, Hodge Avenue, Bryant Street, Oakland Place, Atlantic Avenue, and Delaware Avenue from within the noted Historic Districts. Only those properties directly adjacent

to the Site are within the viewshed as the others are typically masked by other buildings, or outside of the viewshed as a result of distance from the Site. See **Appendix V**.

The work proposed for the interior of the former Women and Children's Hospital of Buffalo will result in changes to the interiors of on the building(s), and therefore may potentially have an impact. Site work and infrastructure improvements may potentially have an adverse impact on the Site. The historic properties adjacent to and within the viewshed of the Project Area are outside the immediate area of potential effect and given that the proposed rehabilitation does not increase the height of existing properties, the viewsheds into and out of the property will not be impacted. The proposed demolition of 187 Bryant Avenue, 180 West Utica, and 184 West Utica will impact the historic fabric of these resources that are contributing to the Elmwood Avenue Historic District (East).

Site work, and infrastructure improvements may potentially have an adverse impact on the Site. The historic properties adjacent to, and within the viewshed of the Project Area are outside the immediate area of potential effect and given that the proposed rehabilitation does not increase the height of existing properties, the viewsheds into and out of the property will not be impacted.

The buildings making up the former Children's Hospital Complex were constructed at various times in response to programmatic needs. Building "C" was first constructed in c. 1917 as the "Service Building," to function as a laundry and heating plant for the hospital. A 3rd floor addition was added in c. 1957-1961, and an addition connecting to Variety tower and Building D were added in c. 1957/1970s. These additions are not considered "character defining" components of the complex, or Building "C." Variety Tower was constructed outside of the Period of Significance. Under Elmwood Crossing Component #6 ("Core Campus" – Former Variety and Tanner Towers, Alfiero and "C" Building Complex), portions of Building "C" and the Variety Tower will be demolished. See **Appendix T** for an illustration of the same.

The proposed demolition of 187 Bryant Avenue under Elmwood Crossing Component #6 ("Core Campus" – Former Variety and Tanner Towers, Alfiero and "C" Building Complex), along with 180 and 184 West Utica under Elmwood Crossing Project #3 (188 West Utica) will impact the historic fabric of these resources that are contributing to the Elmwood Avenue Historic District (East).

The site is not located in an archeologically sensitive area per NYSOPRHP CRIS. The Site has also previously been disturbed during construction of the existing structures and earlier buildings. Therefore impacts to archeological resources (encountering them on site) is extremely unlikely. SHPO previously requested (May 16, 2018 letter) that a Phase IB archaeological study be completed on certain areas of the site, once design plans are completed. This work will be coordinated with SHPO and completed, as necessary, prior to the project moving forward.

2.9.3 Mitigation Measures

To mitigate the adverse impact of the rehabilitation and adaptive reuse of the historic resources associated with the Proposed Project at Elmwood Crossing, proposed work to the building interior, and Site and infrastructure improvements, should be consistent with the Secretary of the Interior's Standards. Any required consultation with the Buffalo Historic Preservation Board and State Historic Preservation Office will occur prior to Site Plan approvals.

To mitigate the adverse impacts associated with the demolition of resources contributing to the Elmwood Historic District (East), documentation of the resource and salvage of historic fabric may be required prior to demolition. It should be noted that the properties proposed to be demolished are common resources found within the historic district and have alterations to their integrity including replacement windows, loss of porches and the addition of vinyl siding. While the demolition of the contributing buildings will have a moderate impact on historic resources, it would not be a significant adverse environmental impact when weighing the overall benefits of the overall project in context with the community and historic district as a whole. The owner will continue their work with the State Historic Preservation Office and with the City of Buffalo Historic Preservation Board.

A construction Protection Plan outlining procedures to avoid damage to historic resources within, and directly adjacent to the proposed work needs to be established and adopted. These resources include buildings on the Site, adjacent buildings and structures in the Elmwood Historic District (East) and the adjacent Elmwood Historic District (West), Delaware Avenue Historic District, Certified Linwood Avenue Local Historic District and Certified Delaware Avenue Local Historic District. The proposed construction Protection Plan is attached as **Appendix U**. If any unanticipated archeological resources are identified during demolition or construction activity on the Site, work in that area will be suspended until SHPO is contacted and a qualified professional can assess the discovery and steps to protect resources prior to construction activity continuing at that location.

The applicant will also continue to coordinate with SHPO once construction plans are completed concerning Archaeological Resources, and may need to complete targeted Phase 1B testing in accordance with SHPO's letter dated May 16, 2018.

2.9.4 Thresholds

Any work outside the designated/proposed areas would require evaluation of these impacts.

2.10 Transportation, Parking and Access

2.10.1 Potential Impacts

The project will potentially create peak hour trips of over 100 cars per hour that may impact the existing road systems. The project will require adequate parking to serve the demand associated with the new development or there would be an impact.

2.10.2 Existing Conditions and Analysis

Transportation

The Site encompasses multiple parcels located along Elmwood Avenue, Bryant Street, Hodge Avenue, and West Utica Street. The Project Sponsor contracted with Bergmann and Associates for study and consultancy on Transportation on the area for the Project. A full copy of their report is attached as **Appendix W**.

Presently, Elmwood Avenue is classified as an Urban Arterial with a speed limit of 30 miles per hour ("mph"). The roadway has one travel lane in each direction between Bryant Street and Utica Street and has an estimated Average Annual Daily Traffic ("AADT") of 12,400 vehicles per day ("vpd"). The street also has one bike lane in each direction and parking on both sides of the street between Bryant Street and West Utica Street. West Utica Street is classified as an Urban Minor Arterial. The street has one travel lane in each direction between Elmwood Avenue and Delaware Avenue with a speed limit of 30 mph. Traffic counts by NYSDOT indicate that it

carries an estimated AADT of 4,800 vpd. Parking is allowed on the north side of this mostly residential stretch of West Utica Street and is prohibited on the south side of the street. Hodge Avenue is a local street with one travel lane in each direction between Elmwood Avenue and Delaware Avenue. The speed limit is 30 mph and parking is alternate side parking, which is typical to the City of Buffalo. Bryant Street is classified as an Urban Major Collector. The street has one travel lane in each direction between Elmwood Avenue and Delaware Avenue with a speed limit of 30 mph. Traffic counts by NYSDOT indicate that it carries an estimated AADT of 3,600 vpd and parking is alternate side parking.

The existing traffic operations during peak hours at the Site intersections range from Level of Service (“LOS”), on a rating scale of A to E, where level D and above is acceptable, for the 12 subject intersections, according to Synchro 10. Synchro is a software program utilized in the traffic engineering discipline. It is recommended by the NYSDOT, and considered an industry-approved method to assess existing traffic signal operations, determine the optimum signal operations for individual intersections and determine the optimum coordination system for signals along a corridor.

The intersections operate acceptably at LOS C or better, except at the intersection of Elmwood Avenue at Summer Street, which operations at LOS E during the PM peak hour due to the short cycle length of the traffic signal. The individual lanes at all the intersections currently operate at LOS A through F. Overall intersection LOS results are provided in Table 2.10.1.1 below:

TABLE 2.10.1.1: EXISTING LEVELS OF SERVICE

INTERSECTION	TRAFFIC CONTROL	2018 EXISTING	
		PEAK HOUR	
		AM	PM
Elmwood Avenue at Utica Street	Traffic Signal	B	B
Elmwood Avenue at Parking Ramp Driveway	Stop Sign (driveway)	A	A
Elmwood Avenue at Hodge Avenue	Stop Sign (Hodge)	A	A
Hodge Avenue at Parking Ramp Driveway	Stop Sign (driveway)	A	A
Elmwood Avenue at Bryant Street	Traffic Signal	B	C
Elmwood Avenue at Summer Street	Traffic Signal	C	E
Elmwood Avenue at North Street	Traffic Signal	C	C
Delaware Avenue at Utica Street	Traffic Signal	B	B
Delaware Avenue at Hodge Avenue	Stop Sign (Hodge)	A	A
Delaware Avenue at Bryant Street	Traffic Signal	B	B
Delaware Avenue at Summer Street	Traffic Signal	B	B
Delaware Avenue at North Street	Traffic Signal	C	C

LOS	CONTROL DELAY PER VEHICLE (seconds)
A	Less than or equal to 10.0

B	Greater than 10.0 to no more than 15.0
C	Greater than 15.0 to no more than 25.0
D	Greater than 25.0 to no more than 35.0
E	Greater than 35.0 to no more than 50.0
F	Greater than 50.0

Parking

The Site's parking needs, when operated as a hospital facility were predominantly met by the John C. Gallagher ramp, located at 489 Elmwood Avenue on the east side of Elmwood Avenue between Utica Street and Hodge Avenue. In addition to the parking ramp, several surface parking lots were located throughout the Site.

Pedestrian Access

Under previous operation as a hospital, Site access was limited to patients, visitors and employees. Entry points were controlled, and the Site was not designed in a manner that invited pedestrian access, or enjoyment.

Analysis of Impacts

Transportation

TRIP GENERATION IMPACTS

The 10th edition of the ITE Trip Generation Manual (latest edition - 2017) was used to determine the future trip generation estimate for the Project at completion. See Table 2.10.1.2 below. The mixed-use redevelopment of the Site includes residential, retail, office, health and wellness, a hotel and a day care. A summary of the size and trip estimate for each individual land use proposed in the Project and as a whole is demonstrated in the table below. This data includes those trips generated by 451 Elmwood, for which the Planning Board granted Site Plan Approval for the five-story mixed-use building on April 23, 2018.

TABLE 2.10.1.2: TRIP GENERATION

TRIPS GENERATED DURING THE:		WEEKDAY AM PEAK HOUR	WEEKDAY PM PEAK HOUR
LAND USE	SIZE	EXTERNAL VEHICLE TRIPS	
Multi-Family Housing (Low-Rise) (ITE Land Use Code 220)	25 Dwelling Units	12	14
Multi-Family Housing (Mid-Rise) (ITE Land Use Code 221)	297 Dwelling Units	89	56
Hotel (ITE Land Use Code 310)	94 Rooms at Expected 75% Average Occupancy Rate	32	31
Health and Wellness (ITE Land Use Code 492)	15,217 Square Feet	9	35
Day Care (ITE Land Use Code 565)	10,070 Square Feet	55	55

General Office Building (ITE Land Use Code 710)	61,225 Square Feet	87	49
Retail (ITE Land Use Code 820)	46,277 Square Feet	33	119
Supermarket (ITE Land Use Code 850)	36,000 Square Feet	102	234
TOTAL EXTERNAL TRIPS		419	593

The total projected full build traffic is the sum of 2022 No Build traffic and the projected increase due to development traffic shown in the table above. The net increase to traffic on the surrounding roadway system is calculated to be 419 and 593 during the weekday AM and PM peak hours respectively.

LEVELS OF SERVICE (LOS) IMPACTS

The 2022 Full Build traffic operations consider estimated background traffic (No Build) and the additional traffic generated by the proposed Project. The 2022 Full Build traffic operations at the subject intersections range from LOS A to C except for the following intersections:

- Elmwood Avenue at Bryant Street – LOS F during the PM peak
- Elmwood Avenue at Summer Street – LOS F during the PM peak
- Elmwood Avenue at North Street – LOS D during the PM peak

The levels of service for all intersection lanes are expected to operate at LOS D or better (acceptable traffic operations) with the complete Project in place, except for the following which occur during the PM peak hour:

- Elmwood Avenue at Bryant Street – Northbound Elmwood Avenue approach is expected to operate at LOS F
- Elmwood Avenue at Summer Street – Northbound Elmwood Avenue is expected to operate at LOS F
- Elmwood Avenue at North Street – Westbound North Street approach is expected to operate at LOS F
- Delaware Avenue at North Street – Eastbound and Westbound North Street approaches are expected to operate at LOS E

Parking

A parking utilization study was conducted to determine if the parking needs for Project were met by the John C. Gallagher ramp, and determine if additional parking structures are warranted. The planned Project includes six separate sites (seven including the Gallagher Ramp parking garage). The Project Sponsor intends for parking supply for each of the six sites to be met, or supplemented by the parking spaces in the Gallagher Ramp.

Working with its consultant, Bergmann and Associates, the projected demand for parking, based on the 4th Edition of the ITE Parking Generation Manual, is summarized in Table 2.10.2.2 below. The total parking capacity within the Project will be 796 spaces and the projected peak demand will be 705 spaces based on the latest ITE Parking Generation Manual (4th Edition).

TABLE 2.10.2.2: PARKING SUPPLY AND DEMAND

ELMWOOD CROSSING PROJECT	LAND USE	PARKING SUPPLY	PARKING DEMAND	GALLAGHER RAMP PARKING DEMAND
Component #1 (451 Elmwood)	28 Apartments 17,425 SF Office 15,964 SF Retail	28	97	69
Component #2 (125 Hodge)	1 Apartment 10,070 SF Day Care	10	31	21
Component #3 (188 West Utica)	24 Townhomes	Each will have a Garage	Supply Meets Demand	Supply Meets Demand
Component #4 (204 West Utica)	36,000 SF Supermarket 58 Apartments 12,913 SF Retail	32	153	121
Component #5 (MH/D Buildings)	120 Apartments	52	97	45
Component #6 (Core Campus)	60 Apartments 17,425 SF Office 15,964 SF Retail	61	327	266
Component #7	Gallagher Ramp Parking Garage*	600	62*	62*
TOTAL **		783	767	584

Pedestrian Access

Given the location of the Site in a dense urban neighborhood, pedestrian access is critical. The proposed design See **Appendix A**, will significantly open the Site to pedestrian traffic and encourage connections between Bryant, Hodge and Elmwood in particular, while also creating pedestrian-friendly development along West Utica.

The proposed design provides improved access by pedestrians to the Site. The Project Sponsor has incorporated cross connection points, as depicted on the Master Plan attached in **Appendix**

A, for pedestrians to pass through the Site. The Site design has been thoughtfully considered in a way that encourages not only access to the Site by pedestrians, but enjoyment of it through benches, public space and art and landscape installations. (See **Appendix C – Greenspace and Connectivity**) No adverse impacts to Access are anticipated,

2.10.3 Mitigated Measures and Thresholds

Transportation

The below mitigations should be considered to alleviate any unacceptable LOS. The 2022 Full Build condition with noted mitigation considers existing lane configurations, calculated background traffic, the additional traffic generated by the Project and the following PM peak hour signal timing adjustments to the traffic signals:

- Elmwood Avenue at Bryant Street – Increase cycle length from 55 seconds to 80 seconds (optimized), providing a greater percentage of time allocated to Elmwood Avenue
- The signal timing adjustment improves the northbound Elmwood Avenue approach from LOS F to LOS C and results in LOS C or better traffic operations for all four approaches to the intersection
- Elmwood Avenue at Summer Street – Increase cycle length from 55 seconds to 80 seconds (optimized), providing a greater percentage of time allocated to Elmwood Avenue
- The signal timing adjustment improves the northbound Elmwood Avenue approach from LOS F to LOS C and results in LOS D or better traffic operations for all four approaches to the intersection
- Elmwood Avenue at North Street – Decrease cycle length from 85 seconds to 80 seconds (optimized), providing a greater percentage of time allocated to North Street
- The signal timing adjustment improves the levels of service on all four approaches to LOS D or better
- Delaware Avenue at North Street – Decrease the signal phase time for Delaware Avenue by 10 seconds and increase the signal phase time for North Street by 10 seconds
- The signal timing adjustment improves the levels of service on all four approaches to LOS C or better

The proposed lengthening of the cycle lengths at the traffic signals on Elmwood Avenue is recommended to improve traffic operations along this principal arterial by providing the proper green band (green signal time for Elmwood Avenue) for the volume of traffic traveling Elmwood Avenue.

2022 Full Build with Mitigation Levels of Service

The projected 2022 Full Build traffic operations with the above traffic mitigations in place are expected to range from LOS A to C for the study area intersections. The individual lanes at all the intersections are expected to operate at LOS A through D.

The Project Sponsor has provided achievable mitigations for the Projects impacts that are available, and reasonably assumed to be employed. Based on these mitigations, the Project will not result in adverse impacts to traffic conditions.

Conditions where the final Site Plan exceeds the number of units, or structural square feet, by more than a nominal amount, beyond those studies provided in the Traffic Impact Study, would demand assessment of the additional impact.

Parking

The analysis for the Project as depicted on the Plan demonstrates the Project will not result in any significant impacts to parking conditions. Parking considerations by the Project Sponsor also include:

- Construction of access driveways to Utica Street, Hodge Avenue and Bryant Street as shown on the Concept Plan retain the existing driveways to Elmwood Avenue and to Utica Street for the Gallagher Ramp.
- Construction of an entrance/exit on the east side of the Gallagher Ramp parking garage to provide access from the supermarket parking lot on Site #4.
- Construction of a new driveway from the Gallagher Ramp parking garage to Hodge Avenue.

This would provide a positive impact on parking and traffic flow.

Pedestrian Access

There are not adverse impacts, so no mitigation measures are proposed.

Conditions where the final Site Plan changes substantively, would demand assessment of the additional impact.

2.10.4 Thresholds:

Conditions where the final Site Plan exceeds the number of units, has a substantial change of use or change in structural square feet, by more than a nominal amount, beyond those studied by the Project Sponsor, could require assessment of the additional impact.

3.0 Sponsor Alternatives to Proposed Elmwood Crossing

As required by SEQRA regulations (6 N.Y.C.R.R. § 617.9) the Project Sponsor is required to consider and describe alternatives to the proposed Project. The Project Sponsor has evaluated two reasonable alternatives to the proposal that may be feasible, considering the objectives and resources of the Project Sponsor, as well as the required option that would prescribe no action to the site. A description and evaluation of the following alternatives:

- No Action;
- Reuse of the existing structures into residential use only (1); and
- Reuse of the existing structures into commercial use only (2);

These are further described in the subsequent paragraphs, with a visual aid accompanying the description at the conclusion of this section.

3.1 No Action Alternative

As required, the Project Sponsor has considered a *No Action* alternative. This alternative is useful to balance the merits of other considered alternatives, as well as an alternative on its own attributes. Under the No Action alternative, the Project Sponsor would retain ownership (and lease-hold) of the Site, while initiating no change to the land or buildings. At the time of the Project Sponsor's acquisition of the Site, the Project Sponsor was contractually prohibited from reutilizing the site for hospital, and related use. As such, and based on the property being unoccupied by health care personnel on the sale date, the Project Sponsor considers a vacant institutional site for these alternative purposes.

Under this plan, the existing Site buildings (Tanner, Variety, Alfiero, M/H, D, C, along with any support structures) would remain intact, parking lots would remain paved surface lots, and grounds would remain in the form at transition of ownership.

The No Action alternative would leave an approximate 7.5-acre site void of economic, social and other activity in the center of otherwise vibrant neighborhoods with active civic life. The Site would be quiet without pedestrian or vehicular traffic. The general calm of the Site would likely attract wildlife to the Site including small animals, such as rabbits, rodents, and fox, as well as birds, and other animal species.

The existing buildings would remain secure and intact, with no demolition. While the structures have ample life expectancy, in current form they would aesthetically be described as institutional in nature. Property owners are required to maintain their property to reasonable standards, however vacancy has the propensity to attract activities such as vandalism (graffiti, broken windows, and destruction of property) and unauthorized occupancy (squatting).

The No action alternative would not achieve the Purpose and Need of the project or the Community's plans.

The No Action decision by the Project Sponsor would not allow the Project Sponsor to work with the City of Buffalo to find a suitable reuse of for the John C. Gallagher parking ramp, as there would be no demand by the Sponsor.

No Action is not a preferred alternative, as this would have a negative result to the Project Sponsor as the inactive site would produce no current or future economic benefit and this alternative would be in conflict with agreements entered into with the seller.

Based on the above-described detriments to the Project Sponsor, as well as predictably the community at-large, this alternative is not considered feasible or preferred by the Project Sponsor.

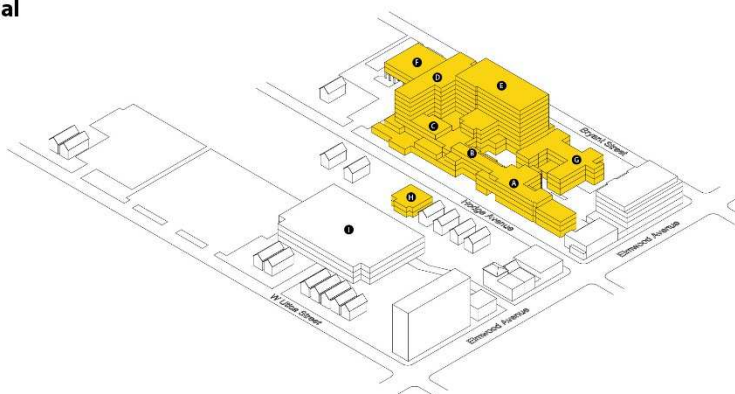
3.2 Redevelop Entire Property into Residential Use (1)

The Project Sponsor has considered the alternative for the reuse of the entire Women and Children's Hospital of Buffalo site for only residential use purposes. This alternative would provide for a mix of apartments (studio, one-, two-, and three-bedroom) and condominium units. Based on the large number of residential units available under this plan, the Project Sponsor would be unlikely to supplement the residential components with any additional townhome units that are contained within the Project Sponsors proposed Elmwood Crossing plan.

Project Sponsor Alternative 1 - All Residential

ID	Building Name	Gross SF	Apts*
A	Maternity Building (MH)	56,603	38
B	Dispensary Building (D)	29,689	20
C	Service Building (C)	62,143	41
D	Tanner Building	129,997	87
E	Variety Tower	199,889	133
F	Alfiero (P.I.C.U.)	24,281	16
G	Nurses' Building (Annex)	51,504	34
H	Hodge Pediatrics	8,392	6
I	Gallagher Parking Ramp	n/a	n/a
		562,498	375

**Note: Calculation of apartment counts assumed a 20% loss factor and a typical unit size of 1,200 SF*



Under this alternative plan, a total of 562,498 gross square feet would be reused for the individual living units and common areas for residents. Please see Exhibit: Project Sponsor Alternative 1 for a site overview and breakdown of total residential space available per building. Using conventional means of estimating total residential living units, the Project Sponsor estimates this plan would produce 375 housing units which would be a blend of apartment and condominium use. A lack of commercial use may reduce the number of those amenities available to residents.

Traffic evaluation study indicates this 'residential-only' plan would bring approximately 195 residents and visitor vehicular trips to the site during peak morning hours, and 239 vehicle trips during the peak afternoon hours, with peak parking demand occurring overnight, and peak traffic use being from 7 am -9 am and 4 pm to 6 pm. (See Transportation Study in **Appendix W**)

The all residential use alternative would not meet the purpose and need of the project or the Community's Plan. The preferred Plan was developed with extensive public input and reflects the desires of the community and neighborhood.

While the Project Sponsor sees residential use as a primary component to the planned reuse of the Site, restrictions to the ability to transform the Site under these conditions are considered detrimental, and therefore not a preferred or feasible option by the Project Sponsor after closer examination.

3.3 Redevelop Entire Space into Commercial Use (2)

The Project Sponsor has additionally considered the alternative of reuse of the entire Site for commercial use only. This alternative would provide for a mix of office, retail, hotel, entertainment and institutional use, such as school or other large community or non-profit use.

Based on the large footprint and floor-plates, and substantive power sources, light industrial uses would also be considered under this alternative. Based on the aforementioned contractual restrictions, wide-scale health care use would not be considered under this plan.

Project Sponsor Alternative 2 - All Commercial

ID	Building Name	Gross SF	Useable SF*
A	Maternity Building (MH)	56,603	45,282
B	Dispensary Building (D)	29,689	23,751
C	Service Building (C)	62,143	49,714
D	Tanner Building	129,997	103,998
E	Variety Tower	199,889	159,911
F	Alfiero (P.I.C.U.)	24,281	19,425
G	Nurses' Building (Annex)	51,504	41,203
H	Hodge Pediatrics	8,392	6,714
I	Gallagher Parking Ramp	n/a	n/a
		562,498	449,998

*Note: Calculation of useable area assumed a 20% loss factor



Under this alternative plan, a total of 562,498 sf would be designated as commercial space, of which 449,998 sf would be useable (to exclude common areas). Please see Exhibit: Project Sponsor Alternative 2 for a site overview and breakdown of total commercial use space available per building. The Project Sponsor's assumption is a loss of 20% for common areas. Therefore, a reasonable assumption would be that this site, configured fully for hotel and office could reasonably anticipate approximately 2,167 individuals would come onsite during weekdays when hotel occupancy and office users are combined.

This 'commercial-only' plan would bring approximately 702 occupant and visitor vehicular trips to the Site during peak morning hours, and 947 vehicle trips during peak afternoon hours, with peak parking demand occurring during the traditional business day, and peak traffic use being from 7 am - 9 am and 4 pm to 6 pm. The Site would be relatively active during traditional business hours of Monday – Friday from 8-6, while quieted during the evenings and weekends. Because use for commercial purposes would allow for hotel and entertainment (bowling, recreation, nightclub, restaurant and banquet) the Site would attract activity on weekends, which would occur predominantly on the Southeast portions of the campus (former Variety, and Alfiero structures). (See Transportation Study in **Appendix W**)

Current evaluation of market trends and data do not show a strong demand for commercial space in the Western New York region. Current absorption rates of 358,000 annual square feet¹ within the Buffalo metro area reveal that it would take several years for available space to be filled.

Under this plan, all existing surface parking lots would remain surface lots.

This consideration is both out of alignment with the existing character of the surrounding environs, and for both that reason, along with the economic feasibility challenges associated with this approach, this option is not in for consideration a feasible alternative to the Project Sponsor's goals and objectives.

¹ CoStar, Market Analytics Buffalo Metro, Site Accessed August 8, 2018.

The all commercial Use alternative would not meet the purpose and need of the project or the Community's Plan.

4.0 Cumulative Impacts

In the Spring of 2017, the Applicants submitted and received Site Plan approval for the Project located at the corner of Elmwood and Hodge. This Project was approved by the City of Buffalo Planning Board, subject to the condition that any impacts from Elmwood Crossing would be inclusive of this Project to avoid a segmented environmental review. All information contained within the DGEIS includes this Project as part of the analysis of potential impacts of the Elmwood Crossing development. Further, the Project Sponsor only identified one other project in the area. That project, described below, was not included in this analysis as a cumulative impact as it was incorporated into the 20% design factor. The Project is located in a developed portion of the City and no other significant active projects were identified approximate to the Site. As such, no distinct cumulative impacts are identified or analyzed.

The one identified project is the approved 4-story 54 unit condo building (101,700 sf/108 parking spaces) – new construction on site of former commercial building @ W. Utica & Anderson). As stated, this is a relatively small project whose impacts are included in the 20% factor included in some of the analysis.

5.0 Unavoidable Adverse Environmental Impacts

Land Use and Zoning: No significant adverse impacts were identified.

Utilities and Energy Use: No significant adverse impacts were identified.

Visual and Aesthetic Resources: No significant adverse impacts were identified as a result of the re-use of more than 90% of the existing structures. Additionally, mitigation and thresholds will limit the height and density of the Project such as to minimize impacts on visual and aesthetic resources to the maximum extent practicable.

Socioeconomic: No significant adverse impacts were identified.

Air Quality: No significant adverse impacts were identified.

Public Health: While there are no expected significant adverse impacts mitigation measures to minimize potential impacts to contaminants during remedial activities will be necessary.

Public Services: No significant adverse impacts were identified.

Construction Impacts: With the incorporation of mitigation measures and thresholds, the Project is not anticipated to have unavoidable adverse environmental impacts.

Historic, Archeological, and Cultural Resources: The loss of certain structures within the Site may constitute unavoidable adverse environmental impacts. However, by incorporating the proposed mitigation measures, the Project Sponsor will minimize the potentially significant adverse environmental impacts to the greatest extent practicable.

Transportation, Parking, and Access: Incorporating traffic and parking mitigation measures will minimize the potential significant adverse environmental impact to the greatest extent practicable. There are no significant adverse impacts identified with access.

6.0 Irreversible and Irretrievable Commitment of Resources

Construction and operation of the Project requires the commitment of previously developed land for the life span of the Project. Although this is considered irreversible commitment of resources, it is only so during the life of the Project. Once the land is no longer needed for this use, the improvements can be removed and the land could be converted to another use. Therefore, in the long term, the use of the land is neither an irreversible nor irretrievable commitment of resources.

Construction of the Project will result in the short- and long-term commitment of natural resources, including structural steel, gravel, concrete and wood. The long-term commitment of these resources will limit their availability for other projects. However, the amount of materials required will comprise a very small percentage of the U.S. and world production of these materials. Some of the materials, including steel, may be reclaimed and recycled at the end of the Project's life. Therefore, although there will be an irretrievable commitment of some natural resources, this will not a significant impact on the availability of these materials.

The construction, operation and maintenance of the Project will require the irreversible commitment of human and fiscal resources to design, build, operate and maintain the facilities. Human resources will also be committed by governments during the planning, environmental reviews and permitting associated with the Project. The commitment of human resources will not strain local resources.

Project construction, operation and maintenance will require the irretrievable commitment of energy resources, including those derived from petroleum products. Energy will also be committed to the manufacture and transport of materials to construct the Project. Fuel will be consumed by workers commuting to the Site during construction and operation, as well as by construction equipment. Additionally, energy and fuel will be used by the Project and its occupants during the life of the project. Although this will be an irretrievable commitment of resources it will not be a significant amount and will not impact the local energy supply.

7.0 Growth Inducing Aspects of the Project

The Project will create approximately 267 new residential units. Assuming that each unit has 2.27 residents, even if each resident were new to the area, this would increase the City population by only 603 people. The City of Buffalo has adequate infrastructures for new residents without a burden to existing services. In addition, the City's Comprehensive Plan advocates and anticipates population growth as part of the revitalization of the City. Non-Residential aspects of the Project, including the hotel, retail, day care, and office space will not significantly impact growth. The Project will put back into use formerly active facilities in the area, eliminating a possible blighting influence. This could potentially revitalize and re-energize the former Children's Hospital campus, which could further increase population, a beneficial impact.

The other aspects of the Project are unlikely to have any adverse impact on the growth of the area or the City.